

**OXFORD COMMUNITY SCHOOLS  
INDEPENDENT REPORT ON  
THREAT AND SUICIDE ASSESSMENTS  
AND PHYSICAL SECURITY**

**Report One: Current Conditions**

**Trigger Warning: The information discussed in this report is of a sensitive and traumatic nature involving gun violence, death, harm of children, and suicide.**



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## EXECUTIVE SUMMARY

On November 30, 2021, four Oxford High School (“OHS”) students, Madisyn Baldwin (17), Tate Myre (16), Justin Shilling (17), and Hana St. Juliana (14), were shot and killed at the school by another student (the “Shooter”). The Shooter also shot and seriously wounded: Phoebe Arthur (14), John Ascitutto (17), Riley Franz (17), Elijah Mueller (14), Kylie Ossege (17), Aiden Watson (15), and Molly Darnell (teacher). Other students, including Keegan Gregory (15) and Heidi Allen (15), were also victims that day, as they came in close contact with the Shooter and watched him shoot their fellow students and rampage through the school. Countless other students, teachers, administrators, and staff were also traumatized, many of whom tried to save lives that tragic day.

After the shooting, the Oxford Community School District Board (the “Board”) learned that before the shooting, several school employees had become aware of concerning behavior and statements by the Shooter and had interacted with the Shooter, including on the day of the shooting. In July 2022, the Board hired Guidepost Solutions, LLC (“Guidepost”) to independently investigate, generally, the Oxford Community School District (the “District”)’s: i) school safety and security policies and practices in place at the time of the shooting, including for threat assessments and physical security; ii) interactions with the Shooter before the shooting; iii) actions before, during, and after the shooting; and iv) current school safety and security policies and practices, including for threat and suicide assessments and physical security.<sup>1</sup>

Guidepost’s review consists of *two* reports. This first report (“this Report”) addresses only the District’s current school safety and security policies and practices, including for threat and suicide assessment and physical security. This report does not address the District’s school safety and security policies and practices in place at the time of the shooting; interactions with the Shooter before the shooting; or actions before, during, and after the shooting. Those areas of investigation will be addressed in a subsequent report, after our investigation of those matters is complete.<sup>2</sup>

Part One of this Report discusses the current policies, practices, and procedures of proactive threat and suicide assessment at OHS. OHS does not have independent policies but utilizes those provided by the District, so the report addresses the District policies for this portion.

Part Two of this Report addresses the current policies, practices, procedures, and conditions specifically related to physical security at OHS.

As set forth below, in both threat and suicide assessment (Part One) and physical security reviews (Part Two), Guidepost found OHS’s current policies, procedures, and practices satisfactory and appropriate. With respect to threat and suicide assessment, the District’s policies, procedures, and

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<sup>1</sup> For more information, see [About The Investigation - Oxford Schools \(oxfordresponse.com\)](https://oxfordresponse.com).

<sup>2</sup> In our second report, focused on the shooting and events leading up to the shooting, we will discuss more about the victims and the survivors.

practices currently in place are robust and satisfy best practices, and its practices at times go beyond what is mandated by existing policies and guidelines. Guidepost believes that through the recommended adjustments, the District will be able to remedy current procedural gaps and excesses and make the process more sustainable. Similarly, OHS's physical security measures in place are not only commensurate with its current risk environment and any future foreseeable risks, but also surpass those of most schools across the U.S. based on Guidepost's expertise, however, we found areas for improvement.

This report is intended to be forward-looking. By objectively assessing the District's current safety and security conditions and providing constructive recommendations, Guidepost hopes to empower OHS, the District, and the entire Oxford community to heal and make positive progress with confidence.

## Part One: Summary of Findings of Review of Current Threat Assessment and Suicide Intervention Policies and Practices

The risk of a student committing an act of violence against fellow students or staff can be mitigated through a process of identifying, assessing, and managing students who may pose a threat of violence in schools. That is the conclusion of the United States Department of Education ("ED") and the United States Secret Service National Threat Assessment Center ("USSC-NTAC"), which have conducted decades of research on prior school attacks to help prevent future ones from occurring. This process – of identifying, assessing, and managing students who may pose harm to others – is known as "threat assessment." A corollary process for identifying, assessing, and managing a student's potential self-harm is known as suicide assessment.

The District has adopted and implemented policies, practices, and procedures on threat and suicide assessment that meet current best practices. As outlined by the USSC-NTAC, a targeted violence prevention plan has eight core principles: (1) establish a multidisciplinary team; (2) define prohibited and concerning behaviors; (3) create a central reporting system; (4) define the threshold for law enforcement intervention; (5) establish threat assessment procedures; (6) develop intervention options; (7) create and promote safe school climates; and (8) conduct training for all stakeholders.

*First*, the District has created threat and suicide assessment teams with members from various disciplines, including administrators (principals, assistant principals), mental health professionals (counselors, social workers, school psychologists), and law enforcement (school resource officers ("SRO"s)). When conducting threat assessments, the District ensures that members of each discipline are always within the process. At OHS, for instance, two mental health professionals and an administrator will conduct an initial assessment (including interview of the student and gathering of relevant information), and then confer with another administrator (typically the Principal) and the SRO to determine the risk of a threat and develop a case management or school safety/action plan. Ensuring the use of a multi-disciplinary team reduces potential "occupational bias," where, for instance, a mental health professional may view conduct one way and an SRO may interpret the same

conduct differently. A multi-disciplinary team allows for a full exchange of perspectives, leading to better decision making when evaluating potential threats.

*Second*, the District has defined prohibited and concerning behaviors, including imminent warning signs (such as severe rage for seemingly minor reasons, detailed threats of lethal violence, or possession of firearms) and potential early warning signs (such as excessive feelings of isolation or rejection, expression of violence in writings and drawings, or inappropriate access to firearms). In fact, the District currently sets a low threshold for threat assessments, conducting threat assessments for any conduct that is “concerning” or “gives one pause,” regardless of whether the student’s conduct directly or indirectly expresses a threat.

*Third*, the District has a “centralized reporting system” of concerning conduct, with school staff instructed to report concerning behaviors to the building’s administrator immediately. When conduct is reported, the threat assessment team is assembled to conduct the threat assessment process.

*Fourth*, the District has defined the threshold for engaging law enforcement. As an initial matter, the District is currently engaging SROs (deputy sheriffs assigned to the District) for each threat assessment, ensuring that a law enforcement perspective is provided when evaluating and mitigating potential threats. Beyond this, the District has identified conduct – such as discovery of a weapon or imminent threat of violence – where the matter is immediately turned over to law enforcement for management and resolution.

*Fifth*, the District has established threat assessment procedures. These procedures include identifying and creating a climate encouraging disclosure of concerning conduct to administrators and school staff. For instance, the District employs software systems that proactively search students’ school accounts and online search history, with the system automatically alerting school staff members of concerning conduct that may trigger a threat assessment. In addition, the District trains school staff – and encourages students – to identify concerning conduct (observed personally or shared through social media) to enable appropriate intervention. Beyond identifying and reporting concerning conduct, the District has established procedures for conducting threat assessments, which begins with securing the student from his or her classroom by two school staff members, one of whom is a security officer.

The District’s procedures also provide for searching the student’s belongings and the student (through a handheld metal detector wand) in every threat assessment. Further still, the District’s processes direct the threat assessment team members to secure relevant information on the student and situation, including from each of the student’s teachers and online school records. And, the District has recently implemented (as of April 2023) a software-based flowchart system for conducting threat and suicide assessments that ensures no step of the process is missed, including (importantly) inquiring whether the student has access to firearms.

*Sixth*, the District has developed intervention options. For threat assessments, the threat assessment team completes a “Case Management Plan,” and for suicide assessments, the assessment team prepares a “School Safety/Action Plan.” Depending upon the assessment team’s

findings, the plan may require that the student be removed from the school, with readmittance conditioned on securing mental health services.

*Seventh*, the District is making strides in promoting a safe school climate. According to administrators and staff we interviewed, students are encouraged to report concerning behavior to administrators, counselors, or other staff members. The District also requests that students identify a trusted adult, creating bonds between students and staff, and promoting a safe environment. Furthermore, the District posts posters on mental health and bullying, educating students about – and enabling students to secure through scanning a QR code – immediate assistance from a counselor or mental health professional. As set forth more fully below, in addition to posting posters and sending newsletters, the District should communicate directly, perhaps by email, with all students and their families about the District’s anti-bullying policies and the support available to students and their families.

*Eighth*, and finally, the District is providing training to staff members on threat and suicide assessments. For instance, staff members received training in the spring of 2022 on threat assessment principles from a security consultant. More recently, staff members are attending training sessions – basic and advanced – from Melissa A. Reeves, PhD, NCSP, LPC, who is a nationally recognized behavioral threat assessment expert.

While the District’s current threat and suicide assessment practices satisfy the principles for a threat assessment process, we have concern on sustainability. Currently, the District is conducting a full threat assessment process for any “concerning conduct,” regardless of whether that conduct even arguably presents a threat. With this low threshold, the District is conducting 300% more threat assessments than comparably-sized districts. This is not without consequences. Of the District’s counselors who agreed to speak with us, they explained that they are unable to provide the needed guidance and academic support to students given the heavy shift of their workload to participating in and conducting threat assessments. Moreover, with threat assessments being conducted at that high rate, and for conduct that transparently is not a threat, a risk exists that the threat assessment team’s time and effort is not properly allocated to more serious matters deserving closer scrutiny.

Nonetheless, even with these caveats, we find that the District’s current threat and suicide assessment practices are robust. However, based on our review of threat and suicide assessments conducted since January 2022, we believe improvements are needed. Our recommendations, as detailed more fully in Part One of this Report, are as follows:

1. ***Threat and suicide intervention teams must inquire about access to weapons and document their inquiry in every assessment.*** Of the 44 suicide assessments that the District provided to us to evaluate, the assessment teams documented that they inquired about access to firearms in only two of the cases. As for threat assessments, the assessment team documented that they inquired about access to firearms in three out of the 20 assessments during the winter semester of 2022 and 21 out of the 28 assessments during the fall semester of 2022. The District’s policy appropriately requires assessment teams to inquire

about a student's access to "dangerous instrumentalities" and firearms in threat and suicide assessments, and District staff must be trained to do so consistently.

2. ***The District should ensure that SROs are included in every threat assessment and, as applicable, suicide interventions.*** A critical feature of a threat assessment team is an array of perspectives, including from an SRO. Over the past year, several assessments did not include an SRO. With the potential of identifying a weapon in a search, and with the importance of having a law enforcement perspective for the safety of students, it is critical that threat assessment teams are reminded – and directed – to include SROs in threat assessments and, as applicable, suicide interventions.
3. ***The District should complete the transition of historical threat assessments and suicide interventions into its new software-based assessment system.*** When evaluating potential threats or suicide, context is critical, especially where the student was subject to a previous threat assessment or suicide intervention assessment. With the transition from a paper-based system to an online system, ensuring the historical threat assessments and suicide intervention assessments are loaded into the new system is critical.
4. ***The District should provide threat assessment training for additional staff members.*** The District has provided threat assessment training to members of the threat and suicide assessment teams, including counselors, social workers, administrators, and SROs. The District should offer training to other staff members, including teachers and other staff who interact with students (such as bus drivers, coaches, cafeteria workers, or custodians). Such training would be tailored to their individual roles, helping them identify – and report on – signs and behaviors that may suggest a student needs additional support or an intervention.
5. ***The District should align its policies and guidelines with its practices.*** The District's suicide intervention and threat assessment practices have evolved over the past year, but the District's policies, guidelines, and forms have not kept pace. For instance, the District's "Forms Manual" includes a "Suicide Report Form" (5350 F1) and a suicide assessment form (5350 F2) that the District does not use. For transparency to the Oxford community, the District should identify on its Forms Manual the forms that it actually uses for suicide assessments. As for threat assessment, the District's administrative guideline identifies a threat assessment process that the District does not currently employ. For instance, that administrative guideline states that threat assessment teams must complete a form (8400 F1) that the threat assessment teams do not currently use and which is no longer included within the District's "Forms Manual." The District should revise its guidelines to reflect the threat assessment model currently used, as well as identify the forms that the threat assessment teams use (if possible with the new threat assessment model).
6. ***The District should better filter reports of concerning conduct and limit full threat assessments to conduct that presents a potential threat.*** The District is conducting too many threat assessments for conduct that clearly does not present a threat. The District currently conducts 300% more threat assessments than a similar school of its size; that is



unsustainable and unnecessary. We recommend that the District identify, at the building level, one or two trusted members (e.g., the principal and SRO) of the threat assessment team who can filter reports of concerning conduct, elevating concerns (such as a substantive threat, repeated conduct by the same student, or fixation on weapons) to the full threat assessment team for review. Doing so will help ensure that the limited resources of threat assessment team members are used on investigating those matters that may present a threat to students and staff.

7. ***The District should continue to evaluate its practices related to conducting searches to ensure a risk-based approach and consistency with District Policies and Guidelines.*** Since November 30, 2021, every threat assessment by the threat assessment teams has included a search. The District should continue to evaluate this practice to ensure sustainability and compliance with District policies and administrative guidelines.
8. ***The District should search for all available information on students where a substantive threat exists.*** Where conduct reflects a potentially serious threat, the District should consider utilizing the District's Information Technology department to search the student's Google Drive and emails for potentially concerning conduct. While the District uses software designed to detect concerning conduct, a search of a student's electronic documents (emails and Google Drive) tailored to the concerning conduct prompting the threat assessment could provide additional information and context to evaluate and resolve a potential threat properly. Additionally, the District should consider acquiring a software solution to proactively scan social media accounts for students for whom a threat or suicide assessment is conducted.

## Part Two: Summary of Findings of District's Current Physical Security Practices and Procedures

Part Two of this Report addresses, from a physical security perspective, how OHS can effectively reduce the risk of another active shooter and improve its response should that occur. Given the public nature of this report, Guidepost has limited the specific details of certain findings that could pose an increased safety and security risk to staff, students, and visitors at OHS, pending the resolution of these recommendations. Guidepost remains available to provide specific details to qualified parties, as necessary.

To address these issues as they relate to physical security, Guidepost assessed all major aspects of security at OHS based on best practices and our own experience performing hundreds of security reviews. Our examination included evaluating architectural elements, electronic security systems, and operational security measures. We also reviewed documents, interviewed stakeholders, conducted site assessments, and examined security technology elements in place. We reviewed past security events to ensure that the security measures in place address foreseeability; that is, the risk that past events may occur again. Due to the shooting on November 30, 2021, Guidepost's

recommendations go beyond those normally recommended for educational institutions; our second report will specifically address physical security before and during the shooting.

We also examined other dimensions of safety and security, including conducting a crime analysis of the school environs and natural hazards risk (such as tornadoes or flooding). We found that OHS's crime risk was lower than the majority of schools in the U.S. The full results of those assessments are found at Appendices D and E to this Report.

We note that in the spring of 2022, OCS conducted a survey of students and Oxford families to ascertain how they felt about safety and security. The survey showed that nearly three in ten students felt unsafe at OHS, and nearly one in five parents and guardians believed that their children were unsafe there.

Due to the shooting on November 30, 2021, and current student and community sentiments regarding safety as indicated above, Guidepost's recommendations for physical security measures go beyond those normally recommended for educational institutions both to provide an additional layer of protection and additional assurance to the students and community. Note that our second report will specifically address physical security before and during the shooting, but this report focuses only on the *current* state of physical security at OHS.

Guidepost found the current security measures at OHS appropriate to the current risk environment and elements of foreseeability; the current security measures at OHS surpass most educational institutions across the U.S. Even before November 30, 2021, the District had invested in security measures and sought additional funding to reinforce them. To best ensure the protection of the students and Oxford community, however, Guidepost identified additional opportunities for improvements and enhancement to be discussed in this Report.

Key components of the security program include the Evolv weapons screening system for the detection of firearms and large knives. Evolv is an AI-based touchless security screening system. This is employed consistently during the school day and working properly. Armed security staff are present at the Evolv screening areas throughout the school day, and after-hours coverage includes armed contract security staff during normal operations and additional contract security staff for high volume events.

To ensure that only authorized individuals enter the campus, OHS uses electronic access control at major entry points and high encryption badges. OHS also has a robust video surveillance system with strong coverage throughout the campus. After the students arrive, the exterior doors remain locked during school hours with free egress for occupants. Certain exterior doors have annunciators or alarms to notify security staff when the door is open. In addition, OHS has continued to use the Nightlock® barricade devices (a brand of security door blocker) for classrooms and office areas and has posted the devices throughout the building. OHS has also updated exterior door numbering, denoted the location of doors for access, and affixed signage to direct visitors to the main office for

entry. It also has 3M film to limit visibility inside the building from the exterior and is using door window shades or covers for classroom doors.

OHS is in the process of activating a new mass notification system using speakers with light strobes to alert occupants to emergencies. This has been delayed in part due to supply chain issues. Until it is activated, OHS is using a public address system that provides fair coverage throughout most of the building but has limitations in some courtyards. In addition, OHS has posted bleeding control kits throughout the building and made training on bleeding control measures a priority. In April 2023, the Board approved the District's updated Emergency Operations Plan ("EOP"), which provides emergency management guidance across all schools. Guidepost's review of the draft EOP found that the plan complies with best practices and regulatory requirements.

While the above findings are impressive, Guidepost also identified opportunities for improvement or enhancement to address certain challenges. The following are among the higher priority observations and recommendations that may require close and/or immediate attention:

1. ***Until the new mass notification system is in place, OHS should consider limiting access to certain courtyards where the existing PA system has sound limitations.*** In certain locations, the PA system does not provide sufficient coverage or intelligibility for emergency notifications based on best practices. OHS is installing a mass notification system for emergency notifications, but until it is active and properly tested, we recommend that persons limit access to the courtyards, where emergency communications have limitations (excepting the senior courtyard, which has adequate PA system coverage). Once the mass notification system is active, OHS should have an audio expert assess the adequacy of coverage in areas of high ambient sound levels, such as in the gym, PAC, and cafeteria and ensure consistent coverage and intelligibility throughout the campus.
2. ***OHS should leverage classroom locking hardware that can be secured from inside the classroom and provide an indication of the lock status.*** OHS invested heavily in Nightlock® barricade devices, but the classroom doors cannot be locked from the inside and/or show the status of the lock (locked or unlocked) for occupants. Further, the District is essentially using the Nightlock® as the primary locking measure during lockdowns, but when properly utilized, it should only be used as a secondary locking measure. Guidepost also took note of the placement of the Nightlock® barricade devices near areas intended for high occupancy, such as the PAC and the gym. The placement of devices that could impede egress for an area intended for high occupancy raises fire and life safety concerns. OCS should ensure that all classrooms, offices, locker rooms, the band room, and similar spaces have classroom locking hardware that can be locked from the inside with an indicator showing locking status of the door. While the Nightlock® devices are helpful, the goal is to ensure that the door can be locked without a secondary device, particularly in the unlikely event the device is not present.

3. ***OCS should expedite its EOP outreach and training and update the vulnerability assessments for each school in order to develop the building-specific emergency plans.*** OCS's mandated development of a vulnerability assessment and emergency plans for each OCS building should be expedited and updated to incorporate recent improvements that have been made. When the school-specific plans are finalized, the legacy emergency flipbooks onsite should be replaced. Guidepost recommends expediting the development of the school-specific emergency plans now that the District EOP is approved.
4. ***OCS should reinstate school safety drills.*** School safety drills should be reinstated with protocols in place to prepare students and staff and communicate with families. In that regard, we recognize that many students are traumatized by the shooting on November 30, 2021, and may need special attention before, during, and following the drills. Guidepost recommends a phased approach to the drills to provide students and staff with time to adjust.
5. ***All OCS personnel, including volunteers, substitutes, coaches, volunteers, and part-time staff, should be trained on ALICE and other emergency protocols.*** For many years, OCS has used ALICE, an emergency protocol that emphasizes: "A" (Alert is your first notification of danger); "L" (lockdown – barricade the room and prepare to evacuate or counter if needed); "I" (inform – communicate the violent intruder's location and direction in real time); "C" (counter – create noise, movement, distance, and distraction to reduce the shooter's ability to shoot accurately); and "E" (evacuate, when safe to do so). Substitute teachers, coaches, volunteers, and part-time staff at OCS are not consistently trained in ALICE or other emergency protocols in use. They should be. Highly visible emergency signage should be present in all classrooms and offices to alert those present to the emergency protocols. This is to ensure that contractors, substitutes, part-time staff, and others who may not regularly be on OCS properties have the basic emergency response information.
6. ***OHS should implement consistent Evolv screening for all school events and all attendees.*** Outside of the normal school day, Evolv screening and visitor management measures are inconsistent. While running Evolv is expensive (because it requires coverage by trained staff), consistent screening is needed to be fully effective. Thorough screening should occur at all school events for all persons (students, parents, visitors, volunteers, staff, contractors, etc.) entering.
7. ***OHS should improve window laminates.*** While OHS has invested in 3M film to limit visibility in OHS student and staff areas, 3M film does not provide rated ballistic resistance. Glass at OHS entrances, as with many schools, creates vulnerability. OHS should install a laminate with bullet resistant materials for the main entry points and the sidelites and glass panels in or near classroom and office doors. The authority having jurisdiction ("AHJ") should be consulted for guidance on installation and to confirm satisfaction with local fire and life safety requirements.

8. ***OCS should remove non-functional panic buttons.*** OCS should expedite the removal of non-functional panic buttons to avoid confusion in the event of an emergency.
9. ***OHS should leverage reunification standards.*** As OHS incorporates the I Love You Guys Foundation's Standard Response Protocol,™ Guidepost recommends that OHS also leverage the Standard Reunification Method™ to ensure that staff and students know what to do during the reunification process and parents know how to connect with their student(s) following an emergency. Using the reunification method will provide consistency to the emergency management approach.
10. ***OHS should remove fenced area in locker rooms.*** During its assessment, Guidepost saw fencing with gates and chains that could be used to trap someone in the locker rooms. This presents fire and life safety and bullying or hazing concerns. Likewise, the fencing facilitates climbing onto the infrastructure. The ductwork could be used for staging or concealment within the locker rooms. Guidepost recommends that either the fencing be removed, or measures taken to prevent persons from being trapped there.
11. ***The Use of Force Policy should be updated to address District Staff.*** Armed District personnel are onsite without a clear Use of Force Policy for firearms. Other groups permitted to have firearms onsite are addressed in District policy and administrative guidelines, but the rules on District employees' use of firearms onsite should be clear.

Guidepost also identified other areas of recommended improvements that may be lower in priority but nonetheless warrant attention, including the following:

1. The District and OHS should continue to survey students, families, and staff as to their feelings about safety and security on campus;
2. OCS should ensure that the School Gate Guardian software is always up to date and collecting the proper information;
3. OCS should staff the security post at the main entrance at all times when the building is unlocked and in use;
4. OCS should establish standards to evaluate the performance of contract security staff;
5. OCS and OHS should continue to track the status of duress alarm card readers that have been ordered, so that they can be timely installed and staff can be trained on them;
6. The position description for the Security Specialist II should be updated to reflect weapons maintenance and training requirements;
7. OCS should confirm that a video surveillance system with remote access is installed and active in the school buses;
8. OHS should install technology to detect intruders attempting to access the rooftop spaces of the building;

9. OHS should investigate the installation of vehicular deterrence measures at main entry points on campus;
10. OHS should implement and enforce a door covering policy to clarify the requirement for staff and students;
11. OHS should enforce the ID badge display policy for staff and contractors;
12. All exterior doors should have door contacts/alarm monitoring points;
13. Up-to-date video management and access control software should be maintained with help from the security integrator;
14. A viewing monitor should be installed for awareness, verification, and follow-up capabilities when the principal's secretary receives a door alert; and
15. The SRO should report to the school principal and the Executive Director of Student Operations.

Guidepost encourages the District to collaborate with its security staff, law enforcement, the fire department, emergency responders, the District Safety Committee, and security advisors in its ongoing improvement of the school security program. Guidepost recommends developing security technology standards. In addition, a vulnerability and risk assessment should be performed, with input from the District Safety Committee, whenever removal, reduction, or addition of security measures is considered.

Finally, maintaining a strong security culture is vital. An educational institution can invest considerable resources in security measures, but when a staff member, student, contractor, or visitor props a door open, all onsite are vulnerable. The educational community must put safety and security at the forefront of its operations.

## INTRODUCTION

Any assessment of a school district's posture relating to security must consider the overall active shooter incidents in the United States and the recent school targets.

### *Active Shooter Incidents in the United States*

Violence caused by active shooters is a national problem. While Michigan has been impacted by active shooters at two public institutions of learning in the past 18 months (Oxford Community Schools and Michigan State University), according to the FBI, over 100 active shooter incidents nationally occurred over the past two years alone.

In 2022, the FBI designated 50 shootings as active shooter incidents.<sup>3</sup> The 50 active shooter incidents occurred in 25 states and the District of Columbia.<sup>4</sup> The state with the most incidents was Texas (6), followed by Arizona, Florida, Michigan, and New York with the second highest number (3).<sup>5</sup> Two incidents each occurred in Alabama, Arkansas, California, Colorado, Georgia, Maryland, Missouri, North Carolina, Oklahoma, Pennsylvania, and South Carolina. One incident each occurred in Illinois, Indiana, New Mexico, Ohio, Oregon, Tennessee, Virginia, West Virginia, Wisconsin, and Washington, D.C.<sup>6</sup>

Four of the 50 incidents (8%) in 2022 occurred at education locations, resulting in 20 students and three employees (23) killed and 19 students, four school employees, three law enforcement officials, and three others (29) wounded.<sup>7</sup> The incident with the highest death toll and the second-highest casualty (injured or killed) count of all active shooter incidents in 2022 was at Robb Elementary School in Uvalde, Texas where 21 were killed and 17 were wounded.<sup>8</sup>

The FBI designated 61 shootings in 2021 as active shooter incidents.<sup>9</sup> The 61 active shooter incidents in 2021 occurred in 30 states.<sup>10</sup> The states with the most incidents were California (6), Georgia and Texas (5 each), and Colorado and Florida (4 each).<sup>11</sup> Three incidents each occurred in Indiana, Michigan, North Carolina, and Tennessee.<sup>12</sup> Two incidents each occurred in Alabama, Arizona, Illinois, Maryland, Nevada, and South Carolina and the following states each had one

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<sup>3</sup> "Active Shooter Incidents in the United States in 2022," FBI, Federal Bureau of Investigation, Apr. 2023 (<https://www.fbi.gov/file-repository/active-shooter-incidents-in-the-us-2022-042623.pdf/view>).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> "Active Shooter Incidents in the United States in 2022," FBI, Federal Bureau of Investigation, Apr. 2023 (<https://www.fbi.gov/file-repository/active-shooter-incidents-in-the-us-2022-042623.pdf/view>).

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> "Active Shooter Incidents in the United States in 2021," FBI, Federal Bureau of Investigation, May 2022 (<https://www.fbi.gov/file-repository/active-shooter-incidents-in-the-us-2021-052422.pdf/view>).

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

incident: Arkansas, Connecticut, Idaho, Kansas, Kentucky, Louisiana, Massachusetts, Minnesota, Mississippi, Missouri, Nebraska, New York, Ohio, Pennsylvania, and Wisconsin.<sup>13</sup>

Two of the 61 incidents (3%) in 2021 occurred at educational locations, resulting in four killed (students) and 10 wounded (eight students, two employees), with almost all of those here in Oxford.<sup>14</sup>

While the FBI has not yet published data related to active shooter incidents in 2023, the *NBC News School Shooting Tracker*<sup>15</sup> utilizes the FBI's definition of an active shooter and provides a relevant point of comparison.<sup>16</sup> In 2023 to date, we have identified nine shootings that have met the criteria for an active shooter incident.<sup>17</sup> Two incidents have occurred in California. One incident each has occurred in Texas, Kentucky, Alabama, Tennessee, Colorado, Michigan, and Virginia. 44 people have been killed and 65 wounded.<sup>18</sup> Four of the nine (44%) incidents in 2023 occurred at education locations, resulting in nine killed (six students and three employees) and eight injured.

### Current State of Michigan Safety Laws

To address threats to students in schools and physical security in schools, the State of Michigan has enacted (over several decades) a series of laws that touch upon various aspects of school and student safety.

One important recent component to the Michigan legal framework is a 2018 law creating the Office of School Safety ("OSS") within the Department of State Police.<sup>19</sup> In conjunction with the Department of Education, the OSS is mandated to create model practices for school safety, including engaging with local law enforcement agencies to assess school buildings and emergency operation plans, as well as to develop and offer training to school staff on school safety.<sup>20</sup>

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<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> Nigel Chiwaya et al., "School Shooting Tracker: Counting school shootings since 2013," NBCNews, NBCUniversal, Apr. 6, 2023 (<https://dataviz.nbcnews.com/projects/20190108-trackers-school-test/leadgraf.html>).

<sup>16</sup> An active shooter is defined as "an individual engaged in attempting to kill people in a confined space or populated area." Other criteria for the NBC News School Shooting Tracker include being on school property during school hours and as students are arriving or leaving or at school-sanctioned or school-sponsored events, having intent to harm students or faculty with a gun, and that at least one person, other than the shooter, is injured or dies. For more information see <https://dataviz.nbcnews.com/projects/20190108-trackers-school-test/leadgraf.html>.

<sup>17</sup> Nigel Chiwaya et al., "School Shooting Tracker: Counting school shootings since 2013," NBCNews, NBCUniversal, Apr. 6, 2023 (<https://dataviz.nbcnews.com/projects/20190108-trackers-school-test/leadgraf.html>).

<sup>18</sup> *Id.*

<sup>19</sup> MCL 28.681.

<sup>20</sup> MCL 28.683.



Although the OSS is an important component of legislative school safety measures, the OSS' mandate could be more robust. Michigan has not legislatively required school districts to develop or maintain threat assessment policies, teams, and procedures. Nor has Michigan mandated that school district employees receive threat assessment training. Legislation pending in the Michigan legislature would require the OSS to provide safety and security training to school resource officers (SROs), school safety personnel, and school staff, including training on threat assessment guidelines.<sup>21</sup>

As discussed more fully below, and despite the lack of a mandate, the District is currently ensuring that its staff is trained by OSS on threat assessment guidelines. While that training is free, the District is required to pay expenses for staff to travel to and attend the sessions since the training is not currently offered virtually by OSS. Additionally, according to the District's Executive Director of School Operations, this District is paying \$200 per staff to attend digital threat assessment training through a third-party provider, such as Safer Schools Together. As such, there is potential for the OSS to improve and model practices from other jurisdictions. For example, the Texas School Safety Center partners with organizations across the country to subsidize virtual training for school districts from various partners, including Safer Schools Together,<sup>22</sup> Safe and Sound Schools,<sup>23</sup> and the I Love You Guys Foundation.<sup>24</sup> As mentioned above, although the OSS has provided in person threat assessment offerings, it would be beneficial for it to provide virtual training and for grants to be made available for those school districts in Michigan that want to take advantage of third-party threat assessment training offerings. The Michigan legislature should consider appropriating funds to school districts for this essential training to be conducted, as well as mandating that school districts require staff periodically to attend the training.

Michigan has also enacted laws on physical security, emergency operation plans, safety drills, and the anonymous reporting of potential self-harm or threats. For instance, Michigan enacted a law in 2018 requiring school districts, in consultation with a law enforcement agency that has jurisdiction over the school district, to develop "an emergency operation plan (EOP) for each school building operated by the school district."<sup>25</sup> The emergency plan must address (among other areas) the following: (1) threats of school violence and attacks; (2) bomb threats; (3) fire; (4) intruders; (5) threats to a school-sponsored activities; (6) a plan to train teachers on mental health and student and teacher safety; (7) a plan to improve school building security, and (8) an active violence protocol. These requirements are comprehensive, and Michigan appropriately provides models to assist

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<sup>21</sup> House Bill 4098. While this proposed bill would require the OSS to provide training, it still would not require school districts to adopt a threat assessment policy. The state should consider such legislation.

<sup>22</sup> For more information see <https://saferschoolstogether.com/>.

<sup>23</sup> For more information see <https://safeandsoundschools.org/>.

<sup>24</sup> For more information see <https://iloveguys.org/>.

<sup>25</sup> MCL 380.1308b.

school districts in formulating emergency operation plans to be tailored to individual districts. Furthermore, in 2014, the State enacted a law requiring school districts to conduct certain safety drills every school year, including three drills each school year “in which the occupants are restricted to the interior of the building.”<sup>26</sup> Such a drill must include security measures that are appropriate for an emergency, such as the presence of a potentially dangerous individual on or near the premises.<sup>27</sup>

Finally, to help ensure that safety concerns are reported, Michigan enacted the “Student Safety Act” in 2020, which created the OK2SAY hotline (available 24 hours a day, 365 days a year). This hotline allows students (and others) to report tips confidentially on potential harm or criminal activities directed at students, school employees, or schools.<sup>28</sup> The substantial majority of the threat assessments and suicide intervention assessments that we did not contain information originating from OK2SAY. Nonetheless, the State providing and funding an anonymous method to communicate safety concerns is one important piece of the framework for identifying and disclosing such concerns.

Regarding threats to students or staff, the State has enacted laws addressing hazing, bullying, and suicide. In 2004, the State adopted a law on hazing at schools, making it a criminal offense.<sup>29</sup> As for bullying, a State law enacted in 2011 (and amended in 2016) requires school districts to “adopt and implement a policy prohibiting bullying,” which is defined as any act that a reasonable person would know is likely to interfere with educational opportunities, adversely affect a student’s ability to participate in educational programs, or have an actual and substantial detriment on a student’s physical or mental health.<sup>30</sup> Michigan’s bullying law requires schools to adopt a policy prohibiting bullying, but also prohibiting retaliation against the target of a bully. This law required school districts to adopt a policy on bullying no later than June 2012. The District adopted a bullying policy in 2007.

Addressing student suicide, the State enacted a law in 2006 “encouraging” school districts “to provide age-appropriate instruction” for students and professional development for school staff “concerning the warning signs and risk factors for suicide and depression and the protective factors that help prevent suicide.” More recently, in 2020, the State enacted the “Save Our Students Act,” which requires school districts to ensure that student identification cards include a suicide prevention hotline telephone number printed on them.<sup>31</sup> This law also requires the State’s Department of Health and Human Services to develop “model information materials regarding suicide prevention services, suicide, depression, and anxiety,” and the law “encourages” school

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<sup>26</sup> MCL 29.19

<sup>27</sup> *Id.*

<sup>28</sup> Public Act 401 of 2020.

<sup>29</sup> MCL 750.411t.

<sup>30</sup> MCL 380.1310b.

<sup>31</sup> MCL 380.1893.

districts to display this “model information” on the school’s website and in conspicuous locations in the school’s counselor’s and principal’s offices.<sup>32</sup> The State, however, does not currently mandate that school districts adopt suicide prevention policies or that they create safety plans for students believed to be at risk of suicide or self-harm. The District did not adopt a suicide prevention policy until February 28, 2023, although the District’s Superintendent previously issued administrative guidelines to district staff on suicide intervention in March 2011.

### **Oxford School District Safety and Security Leadership**

As part of our evaluation of the District’s safety practices and procedures, we first outline the structure and responsibilities of those within the District for safety and security. At the highest level, responsibility for and oversight for safety and security of District students and staff under Michigan law resides with the Board.<sup>33</sup> The Board’s duty, among others, is to “[p]rovide for the safety and welfare of students while at school or at a school-sponsored activity or while enroute to or from school or a school-sponsored activity.”<sup>34</sup>

As part of its executive powers, the Board appoints a Superintendent, who is to enforce the applicable statutes of the State of Michigan, rules of the State Board of Education, and the policies of the Board.<sup>35</sup> While the Board’s primary duty is to establish policy, the Board has delegated to the Superintendent the responsibility to develop and recommend policies to the Board for adoption.<sup>36</sup> The Superintendent, who is the chief executive officer of the school district, is also responsible for the “detailed arrangements under which the school will be operated” to effectuate the Board’s policies, with those “detailed arrangements” reflected in “administrative guidelines.”<sup>37</sup>

The Board has promulgated policies addressing safety of the District’s students and staff. To that end, the Board has stated that it is “continually concerned about the safety and welfare of District students and staff,” and that the Board “will not tolerate behavior that creates an unsafe environment, a threat to safety or undue disruption of the educational environment.”<sup>38</sup> Enforcing this overarching policy, the Superintendent is responsible for administering a district that ensures the safety of its students and staff.

The current Superintendent is Dr. Vickie Markavitch, who assumed the role of Superintendent on January 9, 2023. Superintendent Markavitch has over 50 years of experience in education and served

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<sup>32</sup> MCL 380.1893.

<sup>33</sup> MCL 380.11a(5) (“A general powers school district is a body corporate and shall be governed by a school board.”).

<sup>34</sup> MCL 380.11a(3)(b) and Oxford Community School District Board Policy (“Board Policy”) po0122 BOARD POWERS, Sep. 14, 2021.

<sup>35</sup> Board Policy po0132.2 ADMINISTRATIVE GUIDELINES, Aug. 27, 1996.

<sup>36</sup> Board Policy po1210 BOARD - SUPERINTENDENT RELATIONSHIP, Aug. 27, 1996.

<sup>37</sup> Board Policies po0132.2 SELECTION OF SUPERINTENDENT and po1100 ASSESSMENT OF DISTRICT GOALS, Aug. 27, 1996.

<sup>38</sup> Board Policy po5610 EMERGENCY REMOVAL, SUSPENSION, AND EXPULSION OF STUDENTS, Dec. 8, 2020.

as superintendent for the Oakland County Intermediate School District for over a decade. Dr. Markavitch provided substantial assistance to and cooperation with Guidepost's review.

The Executive Director of School Operations is Allison Willemin (who was hired in late November 2022), and the School Safety Administrator is Jim Vernier (who was hired in late October 2022).

Dr. Allison Willemin oversees safety and security, as well as other areas of school operations, such as transportation, nutrition, pupil accounting, and technology. As for school safety and operations, Dr. Willemin oversees Mr. Vernier's physical security tasks, with her primary areas of focus currently on implementing a new threat assessment protocol and training staff members on that protocol and the completion and approval of the District's EOP.

Mr. Vernier, who has over 25 years' experience as a former police officer, is responsible for overseeing the District's security personnel (including third-party contract security), implements the District's EOP (including safety drills), serves as the District liaison with law enforcement (including OK2SAY), and manages the District's physical security (including the armed guard force, Evolv, and ZeroEyes systems). Mr. Vernier reports to Dr. Willemin. Dr. Willemin and Mr. Vernier, who both cooperated fully with Guidepost's review, are responsible for conducting training on threat assessments going forward, including training administrators, so that they can in turn train members of the threat assessment teams.

### **Board and District Cooperation**

The Board has cooperated with Guidepost's investigation, directing District administrators to provide us with access to all of the documents, records, and other materials we have requested. The District has provided us with access to all requested materials. We received access to almost 700,000 documents (around 790 gigabytes of data), of which approximately 70,000 documents were responsive and required human review for relevance and materiality.

The Board also directed District administrators to *ask* all District employees to cooperate with our investigation. Because cooperation is voluntary and not a condition of continuing employment, many employees have refused to cooperate with our investigation and speak with us. However, many District employees *have* cooperated with us and provided us with critical information. We commend the District employees who cooperated with us. The Board and the administration continue to encourage all District employees to cooperate with our investigation. As the District employees gained a clearer understanding of our work, cooperation improved and allowed us to secure the cooperation needed to complete this report on the District's current school safety and security policies and practices. Guidepost continues to seek cooperation from all District employees, so that our next report on the shooting and the events leading up to the shooting is just as comprehensive as this Report.

**PART ONE:  
THREAT AND SUICIDE ASSESSMENT REVIEW  
AND RECOMMENDATIONS**

## METHODOLOGY

As a first step, Guidepost analyzed all foundational aspects of the District’s approach to behavioral threat assessment and suicide intervention policies for the past five years. This analysis included reviews of all District guidelines, policies, and forms related to school safety, published by the NEOLA (formerly known as North East Ohio Learning Association) and provided to the District through the Michigan School Board Association. NEOLA is an educational consulting firm that provides school district draft school board policies, administrative guidelines, and forms to comply with state and federal laws and policy requirements. In particular, Guidepost examined Chapters 8400 School Safety and subchapters on threat assessment, 5350 Suicide Prevention, 5771 Search and Seizure, and 5772 Weapons.

Guidepost further reviewed threat assessment and suicide assessment authorities such as USSS-NTAC best practices, and FBI and DHS guidance on behavioral threat assessment related to school shootings and prevention. For over twenty years, USSS-NTAC has conducted behavior-based research on the prevention of targeted violence in various contexts, including K-12 schools.

In 2000, Congress authorized USSS-NTAC “to conduct research, training, consultation, and information-sharing on the prevention of targeted violence, and to provide guidance to law enforcement, government agencies, [and] schools.”<sup>39</sup> In evaluating school shootings, USSS-NTAC observed that because most school attacks end quickly, law enforcement generally does not have an opportunity to intervene before serious harm to students or staff. As such, USSS-NTAC emphasizes prevention with a multidisciplinary threat assessment team, trained to identify and evaluate concerning conduct that directly or indirectly suggests a threat to students or staff. While USSS-NTAC has concluded (based on its research of school shootings) that no singular profile of a student attacker exists, it identified the following factors from prior shootings that should inform a school’s threat assessment prevention efforts:

- Most attackers used firearms, and firearms were most often acquired from the student’s home.
- Most attackers had experienced psychological, behavioral, or developmental symptoms.
- Half of the attackers had an interest in violent topics.
- Nearly every attacker experienced negative home life factors.
- Most attackers were victims of bullying.
- Most attackers had a history of school disciplinary actions.
- All attackers exhibited concerning behaviors.<sup>40</sup>

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<sup>39</sup> Lina Alathari et al., *Protecting America’s Schools, a U.S. Secret Service Analysis of Targeted School Violence*, U.S. Secret Service National Threat Assessment Center, U.S Department of Homeland Security, Nov. 2019 ([https://www.secretservice.gov/sites/default/files/2020-04/Protecting\\_Americas\\_Schools.pdf](https://www.secretservice.gov/sites/default/files/2020-04/Protecting_Americas_Schools.pdf)).

<sup>40</sup> Lina Alathari et al., *ENHANCING SCHOOL SAFETY USING A THREAT ASSESSMENT MODEL An Operational Guide for Preventing Targeted School Violence*, U.S. Secret Service National Threat Assessment Center, U.S Department of Homeland Security, Jul. 2018 ([https://www.cisa.gov/sites/default/files/publications/18\\_0711\\_USSS\\_NTAC-Enhancing-School-Safety-Guide.pdf](https://www.cisa.gov/sites/default/files/publications/18_0711_USSS_NTAC-Enhancing-School-Safety-Guide.pdf)).

Second, Guidepost interviewed scores of witnesses, including current District teachers, staff, administrators, community members, third-party consultants, law enforcement, and security officers.<sup>41</sup> A list of all interviewees is provided in Appendix B. We also reviewed and analyzed the SIGMA Threat Assessment and Management program, which is based on the principles articulated in USSS-NTAC and which the State of Michigan and the District adopted. We also met virtually with threat and suicide assessment experts to confirm our understanding of best practices with respect to when and how to conduct a suicide or threat assessment. Their expertise and viewpoints were extremely helpful in preparing for interviews of District and OHS staff members as well as formulating our recommendations.

Of particular note, Guidepost interviewed Dewey G. Cornell, Ph.D., who developed the Comprehensive School Threat Assessment Guidelines, originally known as the Virginia Student Threat Assessment Guidelines (CSTAG). Dr. Cornell, who is a national expert on threat assessments, teaches and conducts research on threat assessment at the University of Virginia. Dr. Cornell's CSTAG model is an evidence-based program supported by five controlled studies. Schools employing this threat assessment approach report less bullying and a greater willingness to seek help for bullying and threats of violence.<sup>42</sup> Dr. Cornell provided guidance related to behavioral threat assessment, including lessons learned and strategies to incorporate an effective behavioral threat assessment program.

Lastly, Guidepost also attended NTAC and SIGMA threat assessment trainings, the latter at Oxford Virtual Academy ("OVA") on October 26, 2022, together with Oxford Threat Assessment Team members. When the District announced the adoption of the SIGMA program, Guidepost reviewed the curriculum and attended training with the District threat assessment teams on the Navigate360 software program that will integrate both the SIGMA Threat Assessment and Management program and the Columbia Protocol for suicide prevention.

Having reviewed the District's policies and guidelines as well as nationally established best practices and guidelines, Guidepost then tested the District's threat assessment and suicide assessment practices against them. We submitted a comprehensive document request to OCS seeking materials pertaining to, among other things, organizational charts and staff lists, meeting minutes, policies, procedures, guidelines, threat and suicide assessments, and technology resources. The District provided redacted Threat Assessments and Suicide Protocol documents (with personal identifying information removed) that they created in the course of responding to reports of threats of violence or self-harm among the student body at OHS. Guidepost reviewed all of these documents, starting with the threat assessments from January to May 2022, then the threat assessments from September to March 2023, and finally the suicide protocol documents from January through March 2023. We analyzed all of these documents with an eye towards determining if best practices were utilized by securing the involved parties, forming a multi-disciplinary team, gathering all available relevant information, conducting interviews, assembling as a team to determine threat level, and providing support and intervention for the subject student and all other impacted parties.

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<sup>41</sup> Guidepost has also worked cooperatively with Oakland County Prosecutor, who shared with Guidepost significant, detailed information relating to the incident.

<sup>42</sup> Dewey Cornell, *Comprehensive School Threat Assessment Guidelines: Intervention and Support to Prevent Violence* (School Threat Assessment Consultants LLC, 2018).

# REVIEW OF CURRENT SUICIDE INTERVENTION AND THREAT ASSESSMENT POLICIES AND PRACTICES

## 1. Overview

The District has policies and practices separately addressing suicide intervention and threat assessments. Guidepost evaluated the District's suicide intervention and threat assessment policies, with this Report addressing the policies and practices in effect following the November 30, 2021 shooting and as of the release of this Report. With parents and guardians sending their children to school every school day, it is critical to assess whether the threat and suicide assessment policies and practices in place *today* meet best practices, as detailed by USSS-NTAC. As discussed below in this Report, we find that the District's current policies appropriately outline the principles for effective threat and suicide assessments, and that the District's threat and suicide assessment practices are consistent with the District's policies and the principles articulated by USSS-NTAC, but room for improvement exists.

Consistent with the USSS-NTAC principles, the District developed a multi-tiered process to ensure a team-oriented approach for identifying, evaluating, and mitigating potential threats to students or staff. As discussed more fully below, the District's approach includes casting a wide net to identify any concerning conduct, which is immediately referred to a multi-disciplinary threat assessment team or suicide intervention team.

These teams consist of administrators (including principals, assistant principals, and dean of students), mental health professionals (such as counselors, social workers, family school liaisons, and school psychologists), and (for threat assessments) security and SROs (deputy sheriffs with the Oakland County Sheriff's department).

Once an assessment team is notified of a concerning conduct, and if the school is in session, the student is retrieved from his or her classroom by two school-affiliated individuals, typically one non-security member of the threat assessment team (such as a counselor or administrator) and an armed security member.

Whenever a student is retrieved based on concerning conduct, the threat assessment team determines whether the concerning conduct reflects potential self-harm or a threat to others. If the concerning conduct is potential self-harm (such as a statement, "I don't want to live"), then the team will follow the suicide intervention process. On the other hand, if the concerning conduct reflects a concern of harm to others, then the team conducts a separate threat assessment review. Occasionally, the team will determine that the conduct reflects both potential self-harm and harm to others, in which case the threat assessment team may conduct both a suicide intervention assessment and a threat assessment. Other times, the assessment teams may shift from a suicide assessment to a threat assessment or vice versa based on additional information gathered during the review.

For a threat or suicide intervention assessment, the student and his or her belongings are searched for weapons or other items that could cause harm. The assessment team also reviews the student's belongings



(including any writings or drawings) for evidence relating to the student's potential intention. Dividing tasks to collect information from various sources, one member of the team will solicit input from the student's current teachers, while another member searches the student's scholastic and discipline history through the school's electronic databases. Once this information is gathered, the student is interviewed by two mental health professionals (counselor, social worker, or psychologist) and one administrator (typically assistant principal or principal). Among other areas of inquiry, the assessment teams inquire whether the student has access to dangerous instrumentalities capable of inflicting a mortal wound, with threat assessment teams directed (and guided by a form to ask) whether the student has access to firearms.

Following the interview and investigation, the team, will identify the risk of suicide, and based on that determination, either ensure that the student is transported home or to a hospital (if there is a moderate or high risk of suicide) or to develop an intervention plan (if there is a low risk). As for threat assessments, the assessment team, in consultation with the SRO, determines whether the student's conduct presents a threat to the student or others. If the team determines that there is an imminent threat, it alerts emergency responders and the building administrator takes immediate steps to protect students and address the student's specific plans, including emergency removal from school. If the team determines this is a non-immediate threat, the team develops a plan to resolve the threat, which may include referral of a student to a mental health professional, with the plan typically providing that the student is prohibited from returning to school until the evaluation is complete.

During the first semester of the 2022-2023 school year (September 2022 to early January 2023), the District completed 32 suicide intervention assessments and 28 threat assessments at the high school. Of the 32 suicide intervention assessments, the risk of suicide was classified as low in 26 of the cases, moderate in four of the cases, and high in two of the cases. Of the 28 threat assessments, fifteen of them were classified as presenting "no threat," 12 of them were "low threat," and one was identified as a "medium threat." The threat assessments we reviewed demonstrate that the teams documented that they inquired whether the student had access to weapons in 21 out of 28 of the threat assessments. The threat assessment teams may have inquired in the other seven cases, but without documenting that they did, we could not definitively confirm this. We have requested documentation, but the District was unable to produce it.

In April 2023, the District transitioned to Navigate 360, a software-based threat assessment process that is used by more than 35,000 schools for behavioral threat assessment and suicide case management<sup>43</sup> With Navigate 360, the assessment team is guided through a decision tree. At each branch of the tree, the system directs the threat assessment team to inquire as to specific factors to evaluate (for instance) whether a potential threat is present, whether the student has a special services or accommodation plan, and whether removal from school or other intervention is necessary. This new software-based system will help ensure that critical factors (such as the student's access to weapons) are not missed and increase uniformity in the threat assessment process across the District.

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<sup>43</sup> A leading national expert on threat assessments, Dr. Dewey Cornell, worked with Navigat360 to incorporate a threat assessment model into Navigat360's Behavioral Threat Assessment Case Manager software solution.

## 2. District Policies, Administrative Guidelines, and Practices

The Board's primary duty is to establish the District's policies, and with respect to safety issues, the Board has adopted policies on weapons, search and seizures, bullying, suicide intervention, and threat assessments. While the Board establishes the overarching policies for the District, the Superintendent is responsible for articulating the "detailed arrangements under which the school district operates," with these arrangements reflected in "administrative guidelines." In keeping with this direction from the Board, Oxford Superintendents have promulgated administrative guidelines implementing the Board policies.

### a. School Safety-Related Policies

As discussed in detail below, the Board has adopted a series of policies addressing safety, with these policies communicating the Board's overriding principle of concern for the safety and welfare of the District's students and staff:

The Board of Education is continually concerned about the safety and welfare of District students and staff and, therefore, will not tolerate behavior that creates an unsafe environment, a threat to safety, or undue disruption of the educational environment.<sup>44</sup>

Most relevant to this Report, these safety policies include policies relating to weapons, searches and seizures, bullying, suicide intervention, and threat assessments.

#### i. Weapons-Related Policies

Consistent with the Board's policy expressing concern for the safety and welfare of students and staff, Policy 5772 prohibits "students from possessing, storing, making, or using a weapon in any setting that is under the control and supervision of the District."<sup>45</sup> The Board adopted this policy in June 2004, and it was last revised in March 2016. Furthermore, it is the Board's policy -- Policy 5610 - to expel any student who possess a firearm in the weapons-free school zone in violation of state law (subject to a narrow exception). This policy was adopted in August 1996 and was last revised in December 2020. The Board also authorizes the Superintendent "to establish instructional programs on weapons that require students to immediately report knowledge of weapons and threats of violence by students and staff to the building principal."<sup>46</sup>

#### ii. Search and Seizure Policy

Consistent with the responsibility of school authorities to safeguard the "safety and well-being of the students in their care," the Board has authorized school authorities to search students in certain circumstances. Recognizing that students may not be subjected to an "unreasonable search and seizure," the Board directs that "no student be searched without reasonable suspicion."<sup>47</sup> A request for a search of a student is to be

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<sup>44</sup> Oxford Community School District Board Policy ("Board Policy") po5610 EMERGENCY REMOVAL, SUSPENSION, AND EXPULSION OF STUDENTS, Aug. 27, 1996.

<sup>45</sup> Board Policy po5772 SCHOOL-SPONSORED PUBLICATIONS AND PRODUCTIONS, Aug. 9, 2022.

<sup>46</sup> Board Policy po5772 WEAPONS, Mar. 16, 2016.

<sup>47</sup> Board Policy po5771 SEARCH AND SEIZURE, Sep. 10, 2019.

directed to the principal. When conducting a search, the policy directs school staff to first request the student's consent to the search. If a student does not consent to a search, the policy continues, the school may conduct a search of the student and his belongings "provided there is reasonable suspicion."<sup>48</sup> When possible, a search is to be conducted by the principal in the presence of the student and another staff member.

### iii. Bullying Policy

One concern raised by certain members of the Oxford community to Guidepost concerns bullying – specifically, the potential for bullying to trigger a threat. As discussed below, bullying is one factor that a multi-disciplinary threat assessment team considers in evaluating whether a situation with a student presents a threat to safety, with bullying being a potential triggering event.<sup>49</sup> The Board adopted a policy (5517.01) strictly prohibiting bullying, which is defined broadly as "written, physical, verbal, and psychological abuse, including hazing, gestures, comments, threats, or actions of a student, which cause or threaten to cause bodily harm, reasonable fear for personal safety or personal degradation."<sup>50</sup>

The policy encourages students who believe they or other students have been victims of bullying to report the situation to an administrator or a teacher or counselor immediately. If the bullying is reported to a teacher or counselor, the teacher or counselor must notify the appropriate administrator. When bullying is reported, the principal is required to "immediately commence" an investigation. During that investigation, the reporting student's identity is to remain confidential to the extent possible. If the investigation confirms that bullying occurred, the policy directs the administrator to take appropriate remedial action, which may include expulsion or referral to law enforcement.

The Board bullying policy directs the Superintendent to establish an initiative for students, teachers, and administrators and other relevant stakeholders "aimed at the prevention of bullying or other aggressive behavior."<sup>51</sup> To that end, the Board policy provides for training for administrators and school staff, students, and parents. As for administrators and school staff, the policy directs the District to provide, and it requires administrators and school employees to undertake, "annual training on preventing, identifying, responding to, and reporting incidents of bullying and other aggressive behavior."<sup>52</sup> The District requires students to undertake "annual training on preventing, identifying, responding to, and reporting incidents of bullying, cyber bullying or other aggressive behavior."<sup>53</sup>

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<sup>48</sup> *Id.*

<sup>49</sup> In particular, the threat assessment form used by threat assessment teams directs the team to explore potential triggering events, including bullying. *See* 8400 F1.

<sup>50</sup> Board Policy po5517.01 BULLYING AND OTHER AGGRESSIVE BEHAVIOR TOWARD STUDENTS, Feb. 28, 2023.

<sup>51</sup> *Id.*

<sup>52</sup> *Id.* According to the Superintendent, all new employees will view a bullying video prior to employment that provides an overview of teacher responsibilities in the anti-bullying effort.

<sup>53</sup> This training for students, according to the Superintendent, is provided to students in advisories during Middle School and High School.

Finally, the policy directs the District to provide all parents and legal guardians the opportunity to take a training on identifying and responding to bullying, cyber bullying, and other aggressive behaviors.<sup>54</sup> In addition to this training opportunity, and anti-bullying posters and newsletters with QR Codes, the District should consider communicating directly with each student family, perhaps by email, setting forth the District's anti-bullying expectations of students and their families and the support available from the District. The District should more directly advise students and their families that bullying is not tolerated, that parents should discuss bullying with their students, and that the anti-bullying support that is available from the District."

In addition, the Board policy directs the District to utilize "restorative practices" to repair the harm caused to the victim and the school community as a result of the bullying behavior. As the Board policy provides, a restorative conference between the victim and the offender is intended to foster an opportunity for the offender to accept responsibility for the harm caused to those affected and to participate in repairing the harm, such as apologizing, participating in community service, counseling, or paying restitution.

This enhanced policy represents an effort to address suspected bullying in Oxford schools and expounds on the Student Code of Conduct, which classifies bullying as a level two to five offense punishable from a one-day suspension to expulsion. For school year 2022-2023, OHS has received reports of 23 bullying situations through the end of March 2023. Of these incidents, 18 occurred in the first semester and five in the second semester. Of the 23 bullying incidents, nine were related to cyberbullying, 11 related to harassment or intimidation, two related to sexual harassment and one related to intimidation behavior.<sup>55</sup> Threat assessment expert Dr. Cornell identifies an anti-bullying intervention policy, along with mental health services and school threat assessment, as three important components for a program to prevent school violence.<sup>56</sup>

#### iv. Student Suicide

On February 28, 2023, the Board adopted a policy on student suicide, recognizing that "depression and self-destruction are problems of increasing severity among children and adolescents."<sup>57</sup> (As discussed more below, since March 2011, the District had an administrative guideline on student suicide intervention, which is nearly identical to the current Board policy.) The Board's policy directs school personnel to "be alert" to students who exhibit "signs of unusual depression or who threaten or attempt suicide."<sup>58</sup> Further, the policy provides that District staff "shall receive professional development training in the risk factors, warning signs for suicide and depression, and about the protective factors that help prevent suicide."<sup>59</sup> The Board's policy directs the Superintendent to develop and implement administrative guidelines for suicide intervention

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<sup>54</sup> The Superintendent indicated that the district will be offering parents a link to information about the school's anti-bullying efforts, policies, and administrative guidelines.

<sup>55</sup> Dr. Markavitch/OCS statistics dated April 5, 2023.

<sup>56</sup> Dewey Cornell, "WABF 2021 Keynote: Dewey Cornell. Threat Assessment to Help Distressed Students and Prevent Violence," World Anti-Bullying Forum, Nov. 1, 2021 (<https://www.youtube.com/watch?v=IDDscSL8GZs>).

<sup>57</sup> Board Policy po5350 STUDENT SUICIDE, Feb. 28, 2023. In January 2023, Guidepost alerted OCS to the fact that the Board did not have a suicide policy. Because this gap could have an immediate impact on student safety, Guidepost recommended that the board adopt a suicide policy.

<sup>58</sup> Board Policy po5350 STUDENT SUICIDE, Feb. 28, 2023.

<sup>59</sup> Board Policy po5350 STUDENT SUICIDE, Feb. 28, 2023.

procedures.<sup>60</sup> The Board’s policy highlights that “[t]he first step of this procedure is to determine if the student has any dangerous instrumentalities,” such as a “weapon, substance or other material capable of inflicting a mortal wound.”<sup>61</sup> Continuing, the policy directs that the suicide intervention process should include the following steps: (1) stabilization, (2) assessment of risk, (3) use of appropriate risk procedures, (4) communication with appropriate parties, and (5) follow-up.<sup>62</sup> Finally, the policy directs the Superintendent to implement instruction for students on the dangers of depression and suicide through age-appropriate programs, instructing on risk and warning signs and access to appropriate prevention services.<sup>63</sup>

#### v. Threat Assessment Policies

The Board’s “School Safety Information” policy, which was initially adopted in April 2004 and last revised in June 2021, authorized the Superintendent to develop threat assessment process and teams.<sup>64</sup> The Board expressed that its policy “is designed to be consistent with the process for identifying, assessing, and managing students who may pose a threat as set forth in the joint U.S. Secret Service and Department of Homeland Security publication, *Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence*.”<sup>65</sup>

The Board’s policy explains that the “primary purpose of a threat assessment is to minimize the risk of targeted violence at school,” with the goal of the threat assessment process to take “appropriate preventative or corrective measures to maintain a safe school environment, protect and support potential victims, and provide assistance, as appropriate, to the student being assessed.”<sup>66</sup> To that end, the Board authorized the Superintendent to create building-level trained threat assessment teams, “with each team headed by the principal and to include a school counselor, school psychologist, instructional personnel and, where appropriate, the School Resource Officer.”<sup>67</sup> The Board policy directs the threat assessment team to meet annually, as well as when the principal learns “a student has made a threat of violence or engages in

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<sup>60</sup> While the Board’s suicide policy was adopted only in February 2023, the District previously adopted suicide intervention administrative guidelines (Administrative Guideline 5350) in March 2011. Interestingly, Administrative Guideline 5350 provides that it was being implemented “[i]n compliance with Board of Education Policy 5350,” which for Oxford did not exist for another 12 years.

<sup>61</sup> Board Policy po5350 STUDENT SUICIDE, Feb. 28, 2023.

<sup>62</sup> Board Policy po5350 STUDENT SUICIDE, Feb. 28, 2023.

<sup>63</sup> The Board’s student suicide policy, adopted on February 28, 2023, was partially designed to comply with the Michigan legislature’s encouragement – offered in July 2006 – that school boards in this state “provide age-appropriate instruction for pupils and professional development for school personnel concerning the warnings signs and risk factors for suicide and depression and the protective factors that help prevent suicide.” *See* MCL 380.1171.

<sup>64</sup> Board Policy po8400 SCHOOL SAFETY INFORMATION, Jun. 8, 2021.

<sup>65</sup> Lina Alathari et al., *ENHANCING SCHOOL SAFETY USING A THREAT ASSESSMENT MODEL An Operational Guide for Preventing Targeted School Violence*, U.S. Secret Service National Threat Assessment Center, U.S Department of Homeland Security, Jul. 2018 ([https://www.cisa.gov/sites/default/files/publications/18\\_0711\\_USSS\\_NTAC-Enhancing-School-Safety-Guide.pdf](https://www.cisa.gov/sites/default/files/publications/18_0711_USSS_NTAC-Enhancing-School-Safety-Guide.pdf)).

<sup>66</sup> Board Policy po8400 SCHOOL SAFETY INFORMATION, Jun. 8, 2021.

<sup>67</sup> *Id.*

concerning communications or behaviors that suggest the likelihood of a threatening situation.”<sup>68</sup> This policy on directing when threat assessment teams meet is too narrow. Threat assessment teams should also be directed to meet to review safety plans for previously conducted threat assessments, ensuring that the plan aligns with current condition and context. Threat assessment teams should also be directed to meet for training, including with District appointed threat assessment coaches. Furthermore, threat assessment teams should be directed to meet to review school climate and culture, evaluating whether students are reporting and feel comfortable to report threats and concerning conduct.

The Board’s threat assessment policy empowers threat assessment teams to gather information to determine “whether a given student poses a threat of violence to a target.”<sup>69</sup> If the team determines there is a risk of violence, the policy continues, the team is to develop “a written plan to manage or reduce the threat posed by the student.”<sup>70</sup>

Furthermore, the Board authorized the Superintendent to create guidelines to:

- Identify threat assessment team members by position and role;
- Require team members to obtain appropriate training;
- Define the nature and extent of behavior that would trigger a threat assessment or action pursuant to a threat assessment;
- Define the types of information that may be gathered during the assessment;
- State when and how parents or guardians of the student are notified and involved;
- Designate the persons responsible for gathering and investigating information; and
- Identify the process from initiation to conclusion of a threat assessment inquiry or investigation.<sup>71</sup>

Finally, the Board’s policy directs all school community members to immediately report to the Superintendent or principal “any expression of intent to harm another person or other statements or behaviors that suggest a student may intend to commit an act of violence.”<sup>72</sup>

#### **b. Administrative Guidelines.**

While the Board is responsible for creating and adopting policies, it delegates to the Superintendent the function of preparing administrative guidelines under which the District will operate, with the requirement that the administrative guidelines “be consistent with the policies adopted by the Board.”<sup>73</sup> Complying with this mandate, the Superintendent has promulgated administrative guidelines, many of which concern student safety. Below, we discuss the District’s administrative guidelines on (1) suicide prevention, (2) search and seizure, (3) bullying, and (4) threat assessment. Each of these guidelines implement – and we find to be consistent with – the respective Board policy.

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<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*

<sup>72</sup> *Id.*

<sup>73</sup> Board Policy po1230.01 DEVELOPMENT OF ADMINISTRATIVE GUIDELINES, Aug. 27, 1996.

### **i. Suicide Intervention Process Guidelines**

On March 1, 2011, the District adopted an administrative guideline (AG 5350) addressing suicide prevention. This administrative guideline provides that “any time a staff member encounters a situation in which a student appears to be contemplating suicide,” the school must take the following steps: (1) stabilize the situation; (2) assess the risk; (3) take appropriate action; and (4) communicate to the appropriate members of the District staff.<sup>74</sup>

To stabilize the situation, the guideline instructs that the student is not to be left alone, and that a staff member should converse with the student immediately to determine if the student has any dangerous instrumentality (such as a weapon, substance, or other material capable of inflicting a mortal wound) on or nearby his or her person. If a student has such an instrumentality, it is to be removed from the student’s environment, if it can be done safely. The student is then to be accompanied to an area away from other students but whether there is another adult, and the principal is to be notified, if possible.

Once the situation is stabilized, either the principal or a staff member must interview the student to assess the risk, classifying the risk into one of three categories: Extreme, Severe, or Moderate. If the principal or staff member determine that the student has a dangerous instrumentality that the student will not relinquish, then the school staff must follow the “Extreme Risk Procedure,” which requires contacting the police and staying with the student until the police arrive.

If the principal or staff member determine that the student does not have a dangerous instrumentality, but nonetheless is in imminent danger of harming himself or herself, the staff member follows the “Severe Risk Procedure.” According to that procedure, a staff member is to attempt to determine the cause of the student’s distress. If the staff member determines that the student’s distress is the result of parental neglect or abuse, the staff member is directed to notify the Family Independence Agency, request that it intervene, and to follow its instructions. If the cause of the student’s distress is something other than parental neglect or abuse, the staff member is directed to call the Oakland County Mental Health Service, require that they intervene, and to follow their instructions.

Finally, if the staff member determines that the student is not in imminent danger of harming himself or herself, the “Moderate Risk Procedure” is followed. That procedure requires the staff member to attempt to determine the reason for the student’s distress, as well as to contact the parents and request that they come to the school right away. The staff member must then assist the parents in contacting an agency or resource person who can provide appropriate intervention.

The District maintains the following form (Form 5350), which was supplied by NEOLA, on the District’s website for staff members to use when evaluating the level of risk in connection with a suicide intervention:

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<sup>74</sup> Administrative Guideline ag5350 SUICIDE INTERVENTION PROCESS, Mar. 1, 2022.

ASSESSMENT OF SUICIDE RISK

Student Name: \_\_\_\_\_ I.D.# \_\_\_\_\_ Date \_\_\_\_\_ Counselor \_\_\_\_\_

**PROBABILITY OF ATTEMPT** LOW MEDIUM HIGH

Instructions: Use as a check list and average for final assessment. Each item carries the same weight.

|                                  | Low  | <b>RISK</b><br>Medium  | High  |
|----------------------------------|--|--|---|
| <b>Suicide Plan</b>              |  |  |   |
| A. Details                       | ___ Vague  | ___ some specifics   | ___ knows when, where, how  |
| B. Availability of means         | ___ not available, will have to get                                  | ___ available, has close by  | ___ has in hand   |
| C. Time                          | ___ no specific time or in future                                    | ___ within a few hours   | ___ immediately   |
| D. Lethality of method           | ___ pills, slash wrists  | ___ drugs & alcohol, car wreck,  | ___ violent action, carbon monoxide   |
| E. Chance of intervention        | ___ others present most of the time                                  | ___ others available if called upon  | ___ no one nearby; isolated   |
| <b>Previous Suicide Attempts</b> | ___ none or one of low lethality                                     | ___ several low or 1 medium lethality history of repeated threats                                  | ___ 1 high lethality or several moderate  |
| <b>Stress</b>                    | ___ no significant stress  | ___ moderate reaction to loss, pressure, or change   | ___ severe reaction to loss, pressure or change   |
| <b>Symptoms</b>                  |  |  |   |
| A. Coping Behavior               | ___ daily activities continue as usual with little change            | ___ some daily activities disrupted; disturbance in eating, sleeping, school work                  | ___ gross disturbances in daily functioning   |
| B. Depression                    | ___ mild, feels slightly down  | ___ moderate, some moodiness, sadness, irritability, loneliness, & decrease of energy              | ___ overwhelmed with hopelessness, sadness, feels worthless   |
| <b>Resources</b>                 | ___ help available; significant others concerned and willing to help | ___ family & friends available but unwilling to consistently help                                  | ___ family & friends not available or are hostile, exhausted, injurious                                 |
| <b>Type of Communication</b>     | ___ direct expression of feelings and suicidal intent                | ___ interpersonalized suicidal goal ("They'll be sorry - I'll show them")                          | ___ very indirect or non-verbal expression of internalized suicidal goal (guilt, worthlessness)         |
| <b>Life Styles</b>               | ___ stable relationships, personality, & school performance          | ___ recent, acting out behavior and substance abuse; acute suicidal behavior in stable personality | ___ suicidal behavior in unstable personality, repeated difficulties with peers, family, teachers, etc. |
| <b>Medical Status</b>            | ___ no significant medical problems                                  | ___ acute but short term or psychosomatic illness  | ___ chronically debilitated, or acute, catastrophic illness   |
| <b>TOTAL CHECKS</b>              | ___ <b>LOW</b>   | ___ <b>MEDIUM</b>  | ___ <b>HIGH</b>   |

However, based on our review of documents and interviews with members of the suicide intervention and threat assessment teams, and as discussed more fully below, OHS personnel utilize their own Suicide Threat Protocol documents, which include: (a) Suicide Behavior Reporting Form; (b) Suicide Lethality Checklist for Youth; (c) Suicide Warning Signs; (d) a parental notification form requiring signature; and (e) an information sheet with local counseling resources available to the student to be shared with the parent. Based on a review of internal documents and interviews with suicide intervention and threat assessment team members, it appears that the Suicide Threat Protocol document was developed by one or more OHS staff including a social worker, and it was first made available to counseling staff in September 2019. Multiple counselors stated that this was the document that they used as opposed to the 5350 form above. One witness told us that some staff had begun using the 5350 form due to its utility in completing a checklist while also remaining focused on making an evaluation.

After taking appropriate action to address the risk, school staff are instructed to inform the appropriate members of the District staff of the facts and actions taken and to follow up with the student and his family. For instance, a staff member should determine if a parent or guardian secured clinical or support services. If support services were not pursued, the staff is to notify the Superintendent to determine appropriate action. And if support services were pursued, the school staff is to maintain continuing contact with the student to communicate interest in his welfare and support of the mental health services being provided.



## ii. Search and Seizure Guidelines

On March 1, 2011, as part of its implementation of the District, implementing Board Policy 5771, the District promulgated guidance for school administrators for conducting searches when they have reasonable suspicion that a student may have in his possession evidence that a rule or law has been violated.<sup>75</sup> As defined in the guideline, “reasonable suspicion” means “grounds sufficient to cause an adult of normal intellect to believe that the search of a particular person, place, or thing will lead to the discovery of evidence” that the student:

- Has violated the student handbook, or
- Has violated a particular law, or
- Possesses an item or substance that presents an immediate danger of harm to students, staff, or the district property.<sup>76</sup>

Requests to search a student are to be directed to the principal. Before conducting the search, the administrative guidelines provide that the principal should request the student’s consent to the search and advise the student that he may withhold consent. If the student does not consent to the search, then the principal “may conduct a search upon reasonable suspicion” that the student is in possession of “an illegal or dangerous substance or object, or anything contraband under school rules.”<sup>77</sup>

In Guidepost’s interviews with all armed personnel (Security Officer and SROs) authorized to aid in removing students from the classroom, those individuals explained that the student is brought to the front office (administration or counseling), where the student and his or her belongings are searched. Students are searched by personnel of the same gender and a wand is generally used on the student to detect hidden objects. The security officer searches the student’s bag for any weapons or items that could harm the student or others. The SRO observes the process in case a weapon is found that must be secured, to protect the student and others from harm. All armed personnel informed us that both in the past and through current day, administrators and counselors need to be reminded by the principal to always have an SRO or security officer present during the search of the student and belongings in case a weapon or other dangerous item is discovered.

## iii. Guideline on Bullying and Other Aggressive Behavior Toward Students

On March 21, 2023, the District adopted (for the first time) an administrative guideline to implement the Board’s policy on bullying.<sup>78</sup> A large section of the administrative guideline is taken verbatim from the Board policy. For instance, the administrative guideline repeats the provision on encouraging students – and requiring staff – to report any situation they believe to be aggressive behavior directed to a student, and it reiterates the policy’s provisions on confidentiality, non-retaliation, training, and remedial action.<sup>79</sup>

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<sup>75</sup> Administrative Guideline 5771 SEARCH AND SEIZURE, Mar. 1, 2011.

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

<sup>78</sup> Administrative Guideline 5517.01 BULLYING AND OTHER AGGRESSIVE BEHAVIOR TOWARD STUDENTS, Mar. 21, 2023.

<sup>79</sup> *Id.*

There are some important additional elements in the administrative guideline that supplement the Board’s policy on bullying. For instance, while the policy provides that a student may report concerning conduct to a principal or assistant principal, the administrative guideline allows “reporters of bullying situations who believe that the bullying concern has not been resolved at the building level” to report their concerns to the Superintendent and, if not resolved at the Superintendent level, to the Board. Moreover, while the policy provides that reports of bullying must be investigated, the guideline directs that the investigation should be completed within five to seven business days. It also provides guidance on conducting the investigation, outlining the following procedure:

- Interview the alleged victim, aggressor, and any witnesses with further information and review other sources of information that help prove or disprove the behavior in question (e.g., video surveillance, screenshots, writings, pictures)
- Determine whether the conduct was a single act or a pattern of acts and identify whether the relationship between the victim and aggressor exploits an imbalance of power.
- Determine whether the conduct substantially interfered with educational opportunities, benefits, or programs of one or more students.
- Evaluate whether the conduct caused substantial disruption in the orderly operation of the school.
- For cyberbullying, determine whether the conduct occurred during school events, on school property, or with school equipment or networks.

The District’s administrative guideline on bullying also provides for the use of “restorative practices that emphasize repairing the harm to the victim and the school community in the correction of bullying behavior.”<sup>80</sup> The District’s K-12 Restorative Practices Coordinator facilitates this process. According to threat assessment experts, it is not a recommended practice to mediate disputes between a bully and his or her victim because of the power imbalance in the relationship and the potential for intimidation. Consistent with this understanding, the District’s bullying administrative guideline provides that restorative practices will be utilized to attempt to mediate a bullying situation only if the process is (1) initiated by the victim, (2) is approved by the victim’s parents or legal guardian, (3) is attended voluntarily by the victim, a victim advocate, the offender, and supporters of the victim and offender, and (4) would provide an opportunity for the offender to accept responsibility for the harm caused and to participate in setting consequences to repair the harm.<sup>81</sup>

Another important inclusion in this new administrative guideline on bullying is that it connects the bullying investigation to threat assessment and suicide assessment. For instance, the bullying guidelines provide that if, during an investigation of a reported act of aggressive behavior or bullying/cyberbullying, the principal or appropriate administrator believes that the reported misconduct either may require a threat assessment or may be evidence of possible suicide or self-harm, then the principal or administrator must commence a threat assessment (as per Policy 8400) or a suicide intervention process (as per Policy 5350).

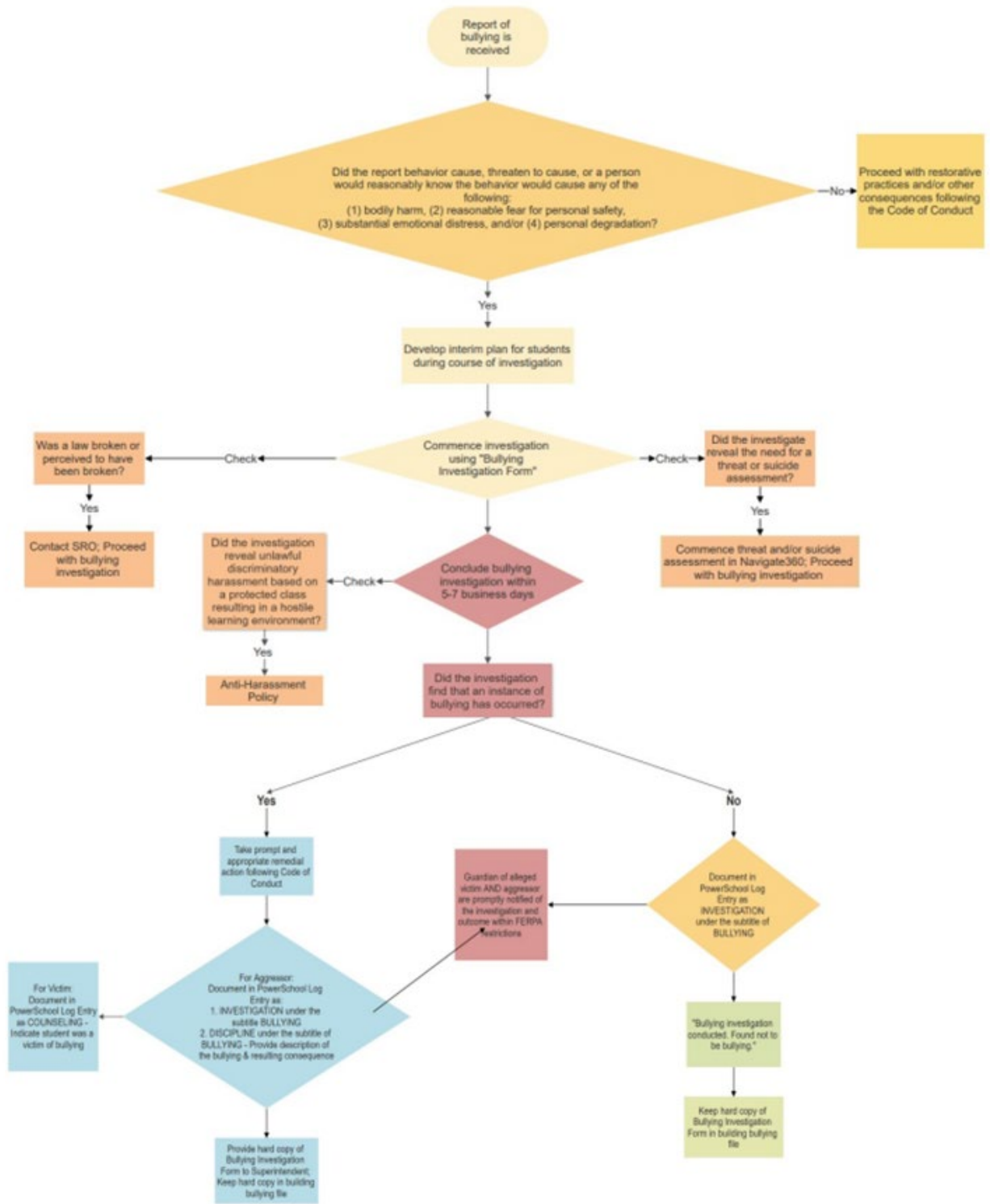
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<sup>80</sup> *Id.*

<sup>81</sup> *Id.*

In addition to recently adopting an administrative guideline on bullying, the Superintendent's office also created a "Bullying Investigation Form" to guide the review, as well as a detailed flow-chart to organize the protocol, as shown below:

# Bullying Investigation Protocol



#### iv. Threat Assessment Guidelines

On September 13, 2022, the District adopted an administrative guideline outlining a procedure for assessing and responding to threats; this administrative guideline aligned with the then-existing threat assessment form (8400 F1) that was available to staff for use in evaluating threats. Recognizing that a student may present a danger to students and staff members, the administrative guideline directs the creation of building-level threat assessment teams, headed by the principal and including a counselor, a school psychologist, a second mental health professional (such as a social worker), instructional personnel, and, where appropriate, an SRO.

The administrative guideline defines a threat as “a concerning communication or behavior that suggests a person may intend to harm someone else.”<sup>82</sup> When a building principal (or her designee) receives a report that a student has made a threat or engaged in behavior that would indicate the student intends to harm someone, the threat assessment team evaluates whether the threat is high level, medium level, or low level based on the following definitions:

- **High Level Threat:** This is a direct, specific, plausible, and imminent threat. The threat is detailed and delineates a plausible plan of action. Examples include a student with a weapon in the building or other information indicating imminent danger on school property.
- **Medium Level Threat:** This is a more general threat with a strong indication that the perpetrator is preparing for action. The threat may suggest a possible place and time, but it is not detailed or immediate. Examples include a Facebook post announcing that the student plans to buy a gun soon and use it, or a YouTube video picturing a ranting student claiming s/he has access to weapons.
- **Low Level Threat:** This threat is vague and indirect. The student’s threatened conduct may be unrealistic or poorly thought-out. Content suggests a general, nonspecific anger towards the school, staff, or peers. Examples include a student essay describing a school shooting or a child yelling that s/he hates everyone and hopes they all die.<sup>83</sup>

As outlined in the administrative guideline, the school’s response is proportional to the level of the threat. For a “High Level Threat,” the Superintendent or the building administrator must:

- Alert emergency responders, follow their direction, and initiate a school lock-down.
- Take immediate steps to protect students and address the student’s specific plan, including emergency removal from school.
- Once the threat is neutralized, direct the threat assessment team to contact the student’s parent and convene a meeting to discuss the student and threat, including evaluating whether the student is eligible for special education.

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<sup>82</sup> With this definition of threat, it would not include self-harm.

<sup>83</sup> Administrative Guideline 8400a THREAT ASSESSMENT AND INTERVENTION, Sep. 13, 2022.

- Complete Form 8400 F1 to document the incident and its response.<sup>84</sup>

For a “Medium Level Threat,” the Superintendent or building administrator must:

- Alert emergency responders and follow their directions.
- Alert the potential target and take measures to secure their safety.
- Direct that a mental health team member evaluates the student, considering the student’s mental state, capacity to carry out the plan, previous interest in violence, and family circumstances.
- Direct the team to determine appropriate steps to address the student’s challenges, including contacting the student’s parent to convene a meeting to discuss the student and threat.
- Complete Form 8400 F1 to document the incident and response.<sup>85</sup>

Finally, for a “Low Level Threat,” the Superintendent of building administrator must direct that a threat assessment team member:

- Contact the student’s parent or guardian to discuss the student and threat, including whether the student qualifies for special education services.
- Conduct an immediate threat assessment, provided that a parent consents in writing.<sup>86</sup>
- Conduct an assessment to determine the student’s risk to himself or others, and the team reviews that assessment with the student’s parents or guardian.
- Complete Form 8400 F1 to document the incident and its response.

As discussed below, while the District’s threat assessment teams used the 8400 F1 form to conduct threat assessments during the winter semester of 2002 and the fall semester of 2022, the District no longer uses the form. Starting in April 2023, the District is using a software-based system with a new threat assessment model. To align its guidelines to its practices, the District should revise this administrative guideline.

### **3. Application of District Policies and Guidelines to Suicide Intervention and Threat Assessments**

Having reviewed the District’s policies and guidelines for school safety, suicide intervention, and threat assessments, we tested the application of the District’s practices against those policies and guidelines. As discussed below, over the past year, the District has employed robust suicide intervention and threat assessment practices.

The District’s practices comply with the Board’s recently-adopted student suicide policy and administrative guidelines on suicide intervention. An effective suicide intervention policy and practice is essential for the safety of not only the student assessed for potential suicidal ideation, but also for the school generally. Suicide ideation is a risk factor for broader violence, with one study finding that more than half of K-12 shooters have a history of psychological problems (e.g., depression, suicidal ideation, bipolar disorder, and

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<sup>84</sup> *Id.*

<sup>85</sup> *Id.*

<sup>86</sup> While the administrative guideline requires “parent consent in writing” to conduct a threat assessment, Oxford Schools have conducted threat assessments during the winter semester of the 2021-2022 school year and throughout the 2022-2023 school year without parental consent.

psychotic episodes.”<sup>87</sup> The District’s suicide intervention practices include completing a checklist so that critical steps in the assessment – from ensuring that a suicidal student is never left alone to inquiring whether the student has access to means of self-harm – are not missed. In addition, although the suicide risk assessment form on the District’s website is not used to evaluate suicide risk, the District’s suicide assessment teams complete a suicide lethality checklist to evaluate potential risk of suicide. Further, the District notifies parents of any identified concerns of a student’s suicide risk, providing information to contact mental health support services, as well as obtaining the parents’ confirmation that they understand the District may need to notify Child Protective Services if no help is sought for the student.

As for threat assessment, the District’s current practices satisfy its policies and administrative guidelines. Moreover, the District’s threat assessment practices are consistent with the national standard set by USSS-NTAC. In fact, the District’s current practices go beyond its threat assessment policy and guidelines. For instance, the District currently searches students (and their belongings) in every threat assessment, regardless of whether an administrator or security resource officer has found that there is reasonable suspicion that a search of the student or his belongings will lead to discovery of evidence that the student is violating a law or the student handbook.<sup>88</sup> Further, consistent with the threat assessment policies and guidelines, the District has formed multi-disciplinary threat assessment teams, including administrators, counselors, social workers, the school psychologist, and SROs. The threat assessment team has received training on evaluating and responding to threats, including developing case management plans to ameliorate a potential threat. And within the past month, the District transitioned to an online, computer-based software threat assessment system, providing a flow-chart framework that streamlines the review for threat assessment teams while helping to ensure that no step in the process is missed.

#### 4. Application of Suicide Intervention Practices Over the Past School Year.

Guidepost asked the District to provide copies of suicide assessments completed (with all identifiable information redacted) to evaluate whether the assessments are consistent with the District’s policies.<sup>89</sup> In April 2023, the District provided us with copies of 44 suicide assessments that were conducted between August 30, 2022, and March 22, 2023. While the District approved the use of a form (5350 F2) to assess the probability of a risk of suicide, the suicide assessments that we reviewed demonstrate that the District’s suicide assessment teams rarely use that form. With the District not using these forms, they should be removed from the District’s approved “form manual” that is published online.<sup>90</sup> Over the past school year, the District’s suicide assessment teams used forms developed internally at the District, including (a) a Suicide

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<sup>87</sup> Robin Kowalski, “School Shootings: What we know about them, and what we can do to prevent them,” Brown Center Chalkboard, The Brookings Institution, Jan. 26, 2022

(<https://www.brookings.edu/blog/brown-center-chalkboard/2022/01/26/school-shootings-what-we-know-about-them-and-what-we-can-do-to-prevent-them/>).

<sup>88</sup> We observe that the District’s Search and Seizure policy provides that, absent consent of a student, an administrator may not conduct a search of a student absent reasonable suspicion. See Board Policy po5771 SEARCH AND SEIZURE, Sep. 10, 2019.

<sup>89</sup> As discussed above, the Board adopted a suicide policy for the first time in February 2023, but the District had an administrative guideline on suicide intervention since March 2011.

<sup>90</sup> The District’s policies, administrative guidelines, and form manual are available at <https://go.boarddocs.com/mi/oxf/Board.nsf/Public?open&id=policies#>.

Threat Checklist; (b) a Suicide Lethality Checklist for Youth; (c) a Suicidal Behavior Reporting Form; and (d) a School Safety/Action Plan.

Starting with the Suicide Threat Checklist, that form provides a series of tasks (“checks”) to be addressed during a suicide assessment, with the tasks divided between responsibilities assigned to a mental health professional (counselor or social worker) and those to staff (a teacher or administrator). The Suicide Threat Checklist is shown below:





## Suicide Threat Checklists

### Counselor/Social Worker

- Never leave a suicidal person unattended
- Use the Suicide Lethality Checklist to assess the suicidal risk
- Complete Suicidal Behavior Reporting Form and give a copy to Administration

#### Low Risk

- Call parent
- Complete Safety/Action Plan
- Provide parent with the following:
  - Suicidal Behavior Reporting Form
  - Suicide Lethality Checklist
  - Resource List
  - Safety/Action Plan

#### Moderate/High Risk

- Call parent and/or 911 if necessary
- Wait with student until parent comes to pick up
- Provide parent with the following:
  - Suicidal Behavior Reporting Form
  - Suicide Lethality Checklist
  - Resource List
  - Parental Acknowledgment Form
- Complete follow-up within 24 hours
- Complete Safety/Action Plan before student returns to school


### Teacher/Staff

- Never leave a suicidal person unattended
- Notify Administration/Counselor/Social Worker immediately
- Stay with student until Crisis Team representative responds
- Relate pertinent information from suicidal intent
- Identify staff/students "at-risk" as a result of this incident and report to Administration

Of the 44 suicide assessments that were provided to Guidepost, 35 of them included a "Suicide Threat Checklist." Of those 35, the checklist was filled out – confirming that the tasks were completed – in 26 of them. Stated otherwise, of the suicide assessments we reviewed, approximately 60 percent of the suicide

assessments included completed Suicide Threat checklists. The Suicide Threat Checklist provides a guide for counselors and staff for the suicide intervention process, but it also provides a record confirming that important tasks were completed. As we outline in the Recommendation section below, administrators should reaffirm to staff members that when conducting a suicide intervention assessment, that they fill out the checklist to document that the tasks were completed.<sup>91</sup>

Unlike the “Suicide Threat Checklists,” the mental health professionals consistently complete the “Suicide Lethality Checklist for Youth,” which requires them to document whether the student has a plan to commit suicide, a method, and whether the method is available. It also requires the mental health professionals to evaluate a series of risk factors to determine whether the risk of suicide is low, moderate, or high. Below is the Suicide Lethality Checklist:




**Suicide Lethality Checklist for Youth**

Student: \_\_\_\_\_ Date: \_\_\_\_\_  
 Completed By: \_\_\_\_\_

**Part One – PLAN**

- What is the plan?  
\_\_\_\_\_
- What is the method?  
\_\_\_\_\_
- Is method available?  
\_\_\_\_\_

|                    | <u>LOW</u>   | <u>MODERATE</u> | <u>HIGH</u> |
|--------------------|--------------|-----------------|-------------|
| • When             | ___Unplanned | ___Vague        | ___Specific |
| • Where            | ___Unplanned | ___Vague        | ___Specific |
| • Previous Attempt | ___No        | ___Yes          |             |
| • Alcohol/Drug Use | ___No        | ___Sporadic     | ___Chronic  |
| • Recent Loss      | ___No        | ___Yes          |             |
| • Depression       | ___No        | ___Yes          |             |



**Suicide Lethality Checklist for Youth**  
(continued)

Student: \_\_\_\_\_ Date: \_\_\_\_\_

**Part Two – Risk Factors**

|   | <u>LOW</u>      | <u>MODERATE</u> | <u>HIGH</u> |
|---|-----------------|-----------------|-------------|
| • Physical Assault*                     | ___No           | ___Recent       | ___Ongoing  |
| • Sexual Assault*                       | ___No           | ___Recent       | ___Ongoing  |
| • Witness to Violence/Trauma*           | ___No           | ___Recent       | ___Ongoing  |
| • Beating/Humiliation*                  | ___No           | ___Recent       | ___Ongoing  |
| • Hyposomnia/Disturbed Sleep            | ___No           | ___Recent       | ___Ongoing  |
| • Preoccupation with Death              | ___No           | ___Recent       | ___Ongoing  |
| • Gender Identity Issues                | ___No           |                 | ___Yes      |
| • Sexual Orientation                    | ___Heterosexual | ___LGB,Q        |             |
| • Poor Impulse Control*                 | ___No           | ___Recent       | ___Ongoing  |
| • Fear of Losing Control                | ___No           | ___Recent       | ___Ongoing  |
| • Loss of Concentration                 | ___No           | ___Recent       | ___Ongoing  |
| • Psychomotor Retardation/Agitation     | ___No           | ___Recent       | ___Ongoing  |
| • Constricted Thinking*                 | ___No           | ___Recent       | ___Ongoing  |
| • Somatic Complaints                    | ___No           | ___Recent       | ___Ongoing  |
| • Expression of Guilt/Shame*            | ___No           | ___Recent       | ___Ongoing  |
| • Expression of Hopelessness*           | ___No           | ___Recent       | ___Ongoing  |
| • Chronically Depressed Parent*         | ___No           | ___Recent       | ___Ongoing  |
| • Turning Against Self (Verbally)       | ___No           | ___Recent       | ___Ongoing  |
| • Support of Others (Real or Perceived) | ___>2           | ___one/two      | ___None     |
| • Refuses to Contract                   | ___No           |                 | ___Yes      |
| Total:                                  | ___Low          | ___Moderate     | ___High     |

From our review of the suicide assessments, we observed that most of the assessments were based on statements from students that did not identify a plan of suicide or method, but instead were general indications of suicide ideation. For instance, a suicide assessment would be conducted where a student

<sup>91</sup> The absence of a Suicide Assessment Checklist in some of the cases may be explained by the fact that the assessment team decided to instead complete a checklist from a separate form, a “Threat/Suicide Checklist.” It appears that this checklist was used in some cases where the conduct was initially identified as a potential threat to others but then transitioned to a suicide assessment. For instance, on one occasion, a threat assessment was started when a student made an off-hand comment about a bomb. During the threat assessment review, however, the student made a comment as to self-harm, with the assessment transitioning to a suicide assessment. There are occasions where staff conduct both a threat assessment and a suicide assessment. Of the 44 suicide assessments we reviewed, the staff completed threat assessments in 9 of them.

stated, “Everyone would be better off without me,” or “I want to kill myself,” or “I’m done with life.” On these occasions, after interviewing the student, the suicide assessment team would generally conclude that there was no plan of suicide and no method. On other occasions, the student’s statement triggering the suicide assessment would be more specific, such as an expression of self-harm mentioning a specific method (razor, knife, or gun). On these occasions, the mental health professional would identify the method, and then inquire as to whether that method was available to the student.

There is no indication that the District’s mental health professionals inquire in every suicide assessment whether the student has access to a weapon. Of the 44 suicide assessments we reviewed, a student mentioned a method involving a gun in only one of them. In that situation, the suicide assessment forms reflect that the suicide assessment team inquired as to the student’s access to weapons. Even when a student does not mention a firearm as a contemplated method, we believe that the suicide assessment teams should inquire as to the student’s access to weapons. Indeed, the District’s (recently adopted) suicide policy and suicide intervention administrative guideline requires a suicide assessment team to “[c]onverse with the student immediately to determine if s/he has any dangerous instrumentalities (weapon, substance, or other material capable of inflicting a mortal wound) on or nearby his/her person.”<sup>92</sup> Suicide is the second leading cause of death overall in the United States among individuals between the ages of 10-14 and the third leading cause of death among individuals between the ages of 15-24.<sup>93</sup> Over 50 percent of those who commit suicide use a firearm (with that method increasing to 58 percent in suicides involving males).<sup>94</sup>

Requiring a suicide assessment team to expressly inquire about access to firearms (of the student and the parent) does not materially change the assessment, especially where the assessment directs the mental health professional to review approximately twenty factors to evaluate the student’s risk of suicide and to contact the parents regarding the situation. Moreover, inquiring about access to weapons (of the student and the parent) can materially improve the safety of the student and the community, ensuring that that student does not have access to a firearm and that any firearm in the student’s home is safely locked.

From the assessments that we reviewed; a suicide assessment team inquired about access to firearms in two assessments where the student had not otherwise mentioned firearms. We commend the suicide assessment team for doing that on those occasions, as that reflects best practices. But 2 out of 44 is not good enough. We strongly recommend that the District train its suicide assessment teams to inquire about access to firearms in every suicide assessment and that the team documents that this inquiry was made of the student and the parent.

In addition to completing a “Suicide Lethality Checklist for Youth,” the suicide assessment team also completes a “Suicidal Behavior Reporting Form,” where the team documents:

- How they became aware of the student’s suicidal threat;
- The incident surrounding the threat/action, such as personal difficulties or school problems;
- The person who contacted the family and which family member was contacted; and

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<sup>92</sup> Board Policy po5350 STUDENT SUICIDE, Feb. 28, 2023, and Administrative Guideline 5350 SUICIDE INTERVENTION PROCESS, Mar. 1, 2011.

<sup>93</sup> “Mental Health Information > Suicide,” National Institute of Mental Health, 2023 (<https://www.nimh.nih.gov/health/statistics/suicide>).

<sup>94</sup> *Id.*

- The parental response to the contact.

If the suicide assessment team determines that the student is at moderate or high risk of suicide, then the student is to be escorted from the school. To that end, the Suicide Behavior Reporting Form requires the team to identify the person who transported the student home or to a hospital. On the other hand, if the suicide assessment team determines that the student is at low risk of suicide, the team completes a “School Safety/Action Plan.” A “School Safety/Action Plan” requires the suicide assessment team to detail the warning signs that a crisis may be developing for that student, articulate coping strategies that the student will use to attempt to alleviate a potential crisis, and to identify a school staff member that the student can contact for support. With this information, the suicide assessment team develops an action plan, with articulated interventions and identified staff members responsible for those interventions. Based on the suicide assessments we reviewed, the District’s staff consistently completed “School Safety/Action Plans,” with mental professionals identifying potential warning signs, coping strategies, and detailed interventions before allowing the student to return to the classroom, in keeping with the Suicide Threat Protocol.

Finally, the suicide assessment process requires the suicide assessment team to send a form letter to the student’s parent or guardian, which reaffirms to the parent that school staff had reason to believe the student may be at risk for suicide and urges the parent or guardian to seek an immediate evaluation for the student from a mental health professional or physician. That letter also provides information to contact mental health support services. Further still, the letter requires the parent or guardian to indicate whether they agree to cooperate and follow through with recommendations made and to confirm their understanding that Child Protective Services will be contacted if no help is sought for the student. This letter is to be signed by a member of the suicide assessment team as well as the student’s parent. A copy of the form letter is shown below:



Date: \_\_\_\_\_

Dear Parent/Guardian:

A recent contact with \_\_\_\_\_ has given staff reason to believe that he/she may be at risk for suicide. Eight out of ten children who commit suicide give some warning prior to taking action. About two-thirds discuss it in the last few months before their death—sometimes with relatives, friends, a doctor, clergy or someone they trust. Some children see death as the only option to relieve their unpleasant feelings, while others are making a plea for help or simply testing the idea. As school staff we do not determine the level of threat, but recommend action be taken to properly assess the risk of your child following through with a suicide.

We strongly urge you to seek an immediate evaluation for your child from a mental health professional or family physician. We also strongly suggest that you do not leave your child alone until they are evaluated by a mental health professional. Below are a few agencies that can call to schedule an evaluation. You can also take your child to the nearest emergency room.

- Common Ground Crisis Line.....1-800-231-1127
- Common Ground Walk-in Screening.....248-456-1991
- Harbor Oaks .....855-738-8198
- Havenwyck Hospital.....947-333-9281

- I agree to cooperate and follow through with recommendations made.
- I disagree with recommendations and take full responsibility for the welfare of my child and any outcome of this crisis.
- I understand that if no help is sought for a child at risk of harm that the law requires notification of Child Protective Services for further investigation.

COMMENTS:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Parent/Guardian Signature: \_\_\_\_\_

Staff Signature: \_\_\_\_\_

From our review of the suicide assessments, the suicide assessment teams were consistent in sending these letters to parents, as well as securing parents' agreements to cooperate and confirmation that they understood that the school may need to contact Child Protective Services if the parents did not obtain mental

health support for their student. Based on the suicide assessments we reviewed over the past year, the District secured the parents’ agreement in every case to get mental health support for their student when it was recommended, and the District has not needed to contact CPS for further investigation.

## 5. Application of Threat Assessment Practices Over the Past School Year

Our review determined that the District’s threat assessment current practices are consistent with its threat assessment policies and, administrative guidelines, as well as with the principles for threat assessment programs articulated by the USSS-NTAC. As set forth below, we detail the District’s formation of threat assessment teams and their training. We also detail the threat assessment process, including the District’s definition of concerning conduct that may trigger a threat assessment; the ways in which that conduct may be reported to the threat assessment team for evaluation (e.g., through OK2SAY, monitoring software, or a student or teacher), the process for which a student and his or her belongings are searched, the manner by which the threat assessment team determines whether the concerning conduct presents a threat, and the action taken by the threat assessment team to resolve the threat.

### a. Threat Assessment Teams

The members of the threat assessment team within the District include administrators (principals, assistant principals, and the dean of students), mental health professionals (counselors, social workers, and school psychologist), and the SROs. To administratively manage a large student population, the administrators and counselors on the threat assessment team divide the student population into three groups by alphabet. With each sub-team known as a “Student Relations Team,” the high school student population is allocated as follows:<sup>95</sup>

| Student Relations Teams   |  |   |
|---|--|---|
| A-F   | G-M  | N-Z   |
| <b><u>Assistant Principal</u></b><br>Kristy Gibson-Marshall   | <b><u>Assistant Principal</u></b><br>Kurt Nuss   | <b><u>Assistant Principal</u></b><br>Kevin Nelms  |
| <b><u>Counselors</u></b><br><ul style="list-style-type: none"> <li>• Charles Jergler</li> <li>• Anna Hotchkiss</li> </ul> | <b><u>Counselors</u></b><br><ul style="list-style-type: none"> <li>• Stacey Taplin</li> <li>• Michael Brennan</li> </ul> | <b><u>Counselors</u></b><br><ul style="list-style-type: none"> <li>• Kristen Glaz</li> <li>• Laura Stanjones</li> </ul> |
| <b><u>Dean of Students</u></b><br>Mitchell Brooks   |  |   |

In addition to the assistant principals and counselors, the threat assessment team includes social workers, a school psychologist, and the SROs. One administrator expressed that “one beauty” of the student relations teams is that at least one administrator or counselor will likely have a relationship with the student for whom

<sup>95</sup> The “Student Relations Teams” also include Family School Liaisons who are technically not part of the threat assessment teams. For students with a last name ending in A to F, the Family School Liaison (“FSL”) is Kevin Kalbfleisch. For G to M, the FSL is Kelsey Seawright, and for N to Z it is Pam Fine.

the threat assessment is being conducted. While the SRO agreed to be interviewed by Guidepost, none of the social workers at the high school nor the school psychologist agreed to be interviewed.

### **b. Threat Assessment Training**

On or about December 1, 2021, on the referral of the school's insurer SEGSET, the District retained Secure Education Consultants ("SEC" or "the consultant"). In addition to providing services as an advisor for crisis management, and conducting a safety and security review, SEC was also engaged in the first quarter of 2022 to provide threat assessment training.<sup>96</sup> That training involved a review of the principles for a threat assessment model developed by the Secret Service's NTAC. Consistent with the NTAC model, SEC advised Oxford to develop multi-disciplinary threat assessment teams, including administrators, counselors, SROs, and instructional personnel, such as a teacher or a coach. SEC emphasized the importance of assembling a team with members from different perspectives, including administration, mental health, and law enforcement.

SEC also recommended that the school define concerning and prohibited conduct that would trigger a threat assessment, observing that a low threshold would likely necessitate expedited assessments for conduct where it is clear there is no threat (e.g., a student making a statement, that within context, does not suggest a threat of harm to others). Following the NTAC model, the consultant advised that each school building should have a centralized reporting system, avoiding the risk of information silos while ensuring that the "pieces of the puzzle" are collected and dots connected for any potential threat. The consultant also recommended that the District confirm its threshold for law enforcement intervention, noting that law enforcement should be immediately contacted for an imminent threat. However, the consultant cautioned against too low a threshold for law enforcement intervention, noting that law enforcement presence can chill cooperation.

The consultant also advised that the multi-disciplinary threat assessment teams use a threat assessment form to guide their process of collecting information and interviewing the student, observing that NEOLA's 8400 F1 form (which the D had previously adopted) was a detailed form that could serve this purpose. Finally, the consultant advised the District to continue to promote a safe school environment, highlighting the importance of students engaging with other students (through teams, clubs, or otherwise) and connecting to a trusted adult.

In advance of the 2022-2023 school year, OHS's principal prepared a step-by-step checklist to guide threat assessment team members through the threat assessment process. That checklist includes action steps (such as assembling the threat assessment team and searching the student and his or her belongings), identifies the core tasks of the threat assessment process (such as determining if there is a threat and the threat level), and details the process for documenting the assessment (including completing the 8400 F1 form and logging the incident in a web-based tool known as PowerSchool). As part of the District's training on threat assessment, this checklist was shared and reviewed with staff prior to the commencement of the 2022-2023 school year.

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<sup>96</sup> As will be discussed in the next report on the events preceding November 30, 2021, members of the school district attended a threat assessment training hosted by the Oakland Community Intermediate School district in 2018.

### c. Threat Assessment Process

Since January 2022, the threat assessment process begins with identification of potentially concerning conduct by a student, transitions into securing and searching the identified student to ensure there is no immediate threat, and then concludes with a holistic evaluation of the context surrounding the student and the potentially-concerning conduct to determine whether the conduct presented a threat as well appropriate remedial action, if necessary.

#### i. Concerning Conduct

The District identifies certain “immediate warning signs” that will automatically trigger the threat assessment process. These “immediate warnings signs” include the following:

- Serious physical fighting with peers or family members;
- Severe destruction of property;
- Severe rage for seemingly minor reasons;
- Detailed threats of lethal violence; and
- Other self-injurious behavior or threats of suicide.<sup>97</sup>

School staff is trained to report such conduct immediately to a threat assessment team member, thereby starting the threat assessment process.

The District also instructs school staff to be on the lookout for “early warning signs of potential school violence,” which are defined in Administrative Guideline 8410a. While appreciating that “early warning signs” can be misinterpreted or lead to misjudgments based on stereotypes, school staff is advised to be cognizant of conduct and behavior such as: (1) social withdrawal or excessive feelings of isolation or rejection; (2) low school interest and poor academic performance; (3) uncontrolled anger or patterns of chronic intimidation or bullying; (4) a history of disciplinary problems or past history of violent and aggressive behavior; (5) feelings of being picked on, bullied, or being a victim of violence; (6) inappropriate access to, possession of, and use of firearms; and (7) expression of violence in writings and drawings.<sup>98</sup>

As to expression of violence in writing and drawings, the District cautions that “[m]any children produce work about violent themes that for the most part is harmless when taken in context.”<sup>99</sup> However, the guideline continues, “an overrepresentation of violence in writings and drawings that is directed at specific individuals

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<sup>97</sup> Administrative Guideline 8410b IDENTIFYING AND RESPONDING TO IMMINENT WARNING SIGNS, Mar. 1, 2011.

<sup>98</sup> Administrative Guideline 8410a EARLY WARNING SIGNS OF POSSIBLE SCHOOL VIOLENCE, Mar. 1, 2011; Another “early warning sign” within the guideline is “serious threats of violence.” The administrative guideline observes that “one of the most reliable indicators that a youth is likely to commit a dangerous act toward self or others is a detailed and specific threat to use violence.” Such conduct, however, should not be classified as an “early warning sign” but instead as an “imminent warning sign,” warranting immediate intervention and a threat assessment evaluation.

<sup>99</sup> Administrative Guideline 8410a EARLY WARNING SIGNS OF POSSIBLE SCHOOL VIOLENCE, Mar. 1, 2011.



(family members, peers, other adults) consistently over time, may signal emotional problems and potential for violence,” warranting “guidance of a qualified professional – such as a school psychologist, counselor, or other mental health specialist.”<sup>100</sup>

Beyond immediate or early warning signs, District staff have been instructed to notify the threat assessment team if they witness or hear any “concerning conduct” or any conduct that “gives them pause.” Reporting any “concerning conduct” or conduct that gives “one pause” will capture much more conduct than conduct that is described as a “threat,” which is defined (within the context of school threat assessments) as “an expression of intent to harm someone.”<sup>101</sup> By casting such a broad net, the District will capture (and has been capturing) conduct that on its face is not a threat. While threat assessment teams, including counselors and administrators, are spending a significant amount of time evaluating “concerning conduct” that is not a threat, administrators have stated that in light of the shooting that occurred less than a year and a half ago, they believe the school must maintain (at least for the time being) a “low threshold” for the threat assessment process.

## ii. How Conduct Is Reported to the Threat Assessment Team

As OCS’ Executive Director of Student Services and Wellness reported to the school board, Guidepost’s investigation confirmed that there are multi-inputs for identifying and reporting concerning conduct to a threat assessment team. These inputs include OK2SAY, monitoring computer software (Gaggle and Go Guardian) alerts, and (perhaps most importantly) human intelligence (reports from school staff, students, and parents).

OK2SAY is a student safety program, created by State law and managed by the Michigan State Police that allows students and others throughout the State “to confidentially report tips on potential harm or criminal activities directed at students, school employees, and schools.”<sup>102</sup> While OK2SAY is focused on student tips, OK2SAY accepts tips from students, parents, school personnel, and concerned citizens, 24 hours a day, seven days a week. The tips are routed by the system to a Michigan State Police technician. That technician, in turn, relays the information to the appropriate recipient, which may be local law enforcement, school officials, or community mental health service programs. If the Michigan State Police technician determines that the tip involves an emergency (such as school violence, a threat of suicide, or a crime in progress), the technician routes the information directly to local law enforcement as well as school administration. For situations that the Michigan State Police technician deems non-emergencies, the information is routed to school administrators. In the District, school administrators coordinate with security resource officers to evaluate and investigate OK2SAY tips.

Gaggle is a computer software resource that monitors students’ suite of Google school applications for potentially concerning conduct. Gaggle monitors students’ emails, attachments to emails, and documents maintained on the students’ Google drives, including links to websites, images, and videos. Employing an algorithm, Gaggle classifies potentially concerning content in one of two categories: “Questionable Content,”

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<sup>100</sup> *Id.*

<sup>101</sup> Dewey Cornell, *Comprehensive School Threat Assessment Guidelines: Intervention and Support to Prevent Violence* (School Threat Assessment Consultants LLC, 2018).

<sup>102</sup> “OK2SAY – Michigan Student Safety Program,” Michigan State Police, State of Michigan, 2023 (<https://www.michigan.gov/ok2say>).

known as “QCON,” and “Possible Student Situations,” known as “PSS.”<sup>103</sup> By default, Gaggle tags as QCON content that involves drugs or alcohol, racist messages, bullying, and self-threats or threats to others. Gaggle tags content as PSS if it involves a time-sensitive, imminent possibility of danger to a student or others. While by default, Gaggle tags content involving self-threats or threats to others as QCON, the District directed Gaggle to change this default for its schools. Accordingly, student content that is tagged as involving a potential self-threat or threat to others is classified as a PSS, which (as discussed below) triggers a process requiring a swift response from the District.

When the Gaggle algorithm identifies potentially concerning content, a Gaggle technician (not a computer) reviews the content, classifying it as-QCON or PSS. If the content is identified as QCON, OCS’s “Gaggle Team” and the school administrator are notified. The District’s Gaggle Team consists of approximately fifteen school employees, including administrators, counselors, and teachers. Each member of the Gaggle team volunteers to serve on the team, which includes being “on call” at night and on weekends on a rotation system once a week every three weeks. As the assistant principal/tech director for OCS explained, Gaggle generally correctly designates QCON alerts as not imminent. These alerts are handled by the administration for the school that the student attends, or through the counseling or family service liaison staff.

The process is different for PSS content. In this scenario, the District’s Gaggle team and school principals receive an email from Gaggle with the details of the possible student situation and a text message. A member of the District’s Gaggle team must respond to the text message that he or she is “on it” within five minutes. If no one responds within five minutes, then the Gaggle representative begins to call members of the District’s Gaggle team as listed on a phone tree. If no member of the Gaggle team answers the call, then the Gaggle representative contacts law enforcement. According to the assistant principal/tech director, a Gaggle representative has utilized the phone tree “a handful of times,” but the representative has always connected with a member of the District’s Gaggle team.

In addition to Gaggle, the District utilizes Go Guardian as a tool to proactively evaluate potential threats. Go Guardian filters websites, limiting students’ access to inappropriate content. Moreover, Go Guardian includes a classroom management tool that allows teachers to monitor students’ computer screens when they are using a school-issued Chromebook. Not only does this serve the pedagogical goal of keeping a student on track for their schoolwork, but it also allows a teacher to identify whether the student’s use of the computer reflects any concerning conduct. In addition, when a student is connected to the District’s network, Go Guardian monitors a student’s search history and browsing history (including images). Like Gaggle, Go Guardian uses an algorithm to detect keywords and images for threats of violence or self-harm. If a keyword or image is flagged, the Go Guardian system sends a text message to a group of District employees, including the Executive Director of School Operations and the School Safety Administrator. If no one responds within five minutes that the matter is being reviewed, the Go Guardian system sends (and continues to send) a text message until a District employee responds that the matter is being reviewed and addressed.

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<sup>103</sup> School districts also have the option to monitor a student’s Google suites for a “violation” of the student handbook, such as using a swear word in an email. Gaggle advised the District that this option not be used, as it would likely inundate the school with alerts, distracting from more important matters.

### iii. Securing Student and Searching Belongings

When a threat assessment team is notified of a student's potentially concerning conduct during school hours, two members of the threat assessment team are dispatched to retrieve the student. One of the members of the threat assessment team is security personnel, typically the school's security officer (Jim Rourke) or one of the school's student resource officers (a deputy sheriff). The threat assessment team attempts to have the other person who retrieves the student be someone who has a relationship with the student, such as a counselor or administrator.

When the student is retrieved from his or her classroom, the student is immediately separated from his or her belongings, with the security officer taking possession of the student's backpack. Once the student is escorted to a room within the administration section of the building, the student and his/her backpack are searched. The search of the student typically involves using a metal detector "wand" over the student's clothing to detect any hidden weapons. If the metal detector wand triggers a positive result, the student's clothing is subjected to a "pat down" by a member of the threat assessment team of the same gender as the student. Likewise, the student's backpack is searched for weapons, as well as information relevant to the potential threat (such as drawings or writings).

In connection with searches, the threat assessment practice, as instructed by building administrators, is that an armed security officer be present during a search to ensure that there is at least one member of the team with experience in handling firearms should the search detect a firearm. While this discipline has been emphasized, there have been occasions over the past year where it has not been followed, with searches having been conducted without a security officer present. As such, building principals have had to remind staff on multiple occasions to follow this procedure without exception.

During the winter semester of the 2021-2022 school year, and throughout the 2022-2023 school year, threat assessment teams conducted searches of students and their belongings every time conduct was reported triggering a threat assessment.

Following the tragic event on November 30, 2021, the District's decision to be hypervigilant on conducting searches for every threat assessment is understandable. According to District personnel who we interviewed (including administrators, counselors, and security personnel), the District decided to go above and beyond as to safety measures to create a school environment that was not only objectively safe, but one where the students and staff also subjectively felt safe. With the trauma the students, staff, and community endured from the November 30, 2021, event, the District employed a zero-tolerance approach to safety regarding the risks as to searches of a student and his or her belongings. The District should continue to evaluate this approach to searches of students and his or her belongings.

### iv. Threat Assessment Evaluation

In connection with a threat assessment, threat assessment team members explain to the student at the outset that their goal is to make sure the student and everyone else is safe. Once the student and his or her belongings are searched, the student is kept separated from the student body in an office, with two school

employees (typically including a security officer, administrator, or Dean of Students).<sup>104</sup> The threat assessment team with responsibility for the alphabetical segment of the student population to which the student belongs will assemble to evaluate the threat. If a member of the team is unavailable, another member of the overall threat assessment team will be brought into the team to ensure that there are two mental health professionals (such as a counselor, social worker, or school psychologist) and an administrator present.<sup>105</sup>

The threat assessment team will then begin to collect information on the concerning conduct or potential threat that triggered the threat assessment. For instance, one member of the team will identify the student's classes (through PowerSchool), and that team member will send an email to each of the student's teachers requesting information. To identify the email as one related to threat assessment, the school's practice is to ensure that the subject line of the email is the same, stating "Confidential Student Information Update," with the student's initials and grade level. The body of the email message provides:

Regarding [Student Name]

We have [Student Name] in the office right now and are currently beginning an assessment. We will notify you when we have an update.

We have a lot of background information on [Student Name], but if you have a "piece of the puzzle" and would like to share, please reply back to me.

When a teacher reads such an email, the teacher is trained to respond as soon as possible with any information relating to potentially concerning conduct by the student. With teachers busy instructing students, school administrators acknowledged that there may be some delay in hearing back from teachers. However, school administrators explained that the delay in the response would likely not exceed a single class period, as teachers begin each class by taking attendance on their computer and checking for emails requiring an urgent response. Many of the teachers reply stating that they have no relevant information, but occasionally teachers will respond with pertinent context (e.g., "I heard that the student broke up with his girlfriend recently.").

Another member of the threat assessment team reviews the student's records through eduCLIMBER, a software system that allows school staff to review academic and disciplinary records of a student in one centralized location. Through this system, the threat assessment team can review the student's grades, attendance, discipline history, prior threat assessment history, and SAEBRS assessment. (SAEBRS, which stands for Social, Academic, and Emotional Behavior Risk Screener, is a screener of student risk for emotional and behavioral problems.)<sup>106</sup> The threat assessment team looks for trends, such as a recent decrease in grades or an increase in absences. The threat assessment team will also evaluate the student's

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<sup>104</sup> The Dean of Students will fill in on a threat assessment team if an administrator (principal or assistant principal) is unavailable.

<sup>105</sup> If the student has an individualized assessment plan ("IEP"), the threat assessment team ensures that a school social worker is present during the assessment.

<sup>106</sup> The student and at least one of the student's teachers complete the assessment, which includes nineteen questions, 6 addressed to social behavior, 6 to academic behavior, and 7 to emotional behavior. With each student and a teacher requested to evaluate the frequency of certain behaviors or thoughts within the past month (on a scale of Never, Sometimes, Often, Almost Always). The results are then aggregated to identify a score, classifying the student as either "not at risk" or "at-risk."

extracurricular activities, contacting a teacher or coach with whom the student may have a relationship to obtain input on the student.

Threat assessment teams generally do not attempt to search the student's social media in connection with the process of collecting background information on the student as part of their evaluation. If the person reporting the concerning conduct identified it as a post on social media, a threat assessment will attempt to search that social media. Members of the threat assessment teams related that student social media accounts are generally set to private (i.e., access limited to only those people who the student allows to see them) and that fake accounts may provide false information regarding the student in question. One member stated that many students have a public "mom" account that they want their parents to see and a secret account where they post things that they do not want their parents to see.

Once the background information is collected, members of the threat assessment team (typically consisting of two mental health professionals and one administrator) interview the student, using the six-page 8400 F1 form to guide the interview. That form is divided into four sections: (1) background information on the student and threat; (2) immediate assessment; (3) long-term response; and (4) threat assessment team's evaluation. As for the background information, the team identifies critical information on the student, such as whether the student has prior history of threats, a history of discipline issues, an existing behavioral plan, a medical diagnosis, or an IEP or other educational plan.

As for the immediate assessment, the threat assessment team attempts to discern the student's motivation and mental state, including whether the student is:

- Expressing feelings of hopelessness or despair;
- Displays organized or disorganized thinking;
- Presents a story that is consistent with his or her actions; or
- Views violence as an only option.

Following the 8400 F1 form, as part of the immediate assessment, the threat assessment team evaluates whether the student has a plan, including whether there are details of a plan, whether a plan has been communicated to others, and whether there are potential targets. Importantly, the 8400 F1 form also guides the threat assessment team to determine whether the student has the capacity to carry out a plan, "including access to weapons."

The form also includes a section for "Long-Term Response," which as part of an "in-depth mental health assessment" identifies twenty-factors, such as triggering events, attitude of superiority, low self-esteem, interest in violent entertainment, negative role models, changes in behavior, drug use, outside interests, turbulent family dynamics, and (again) access to weapons.

The threat assessment team members we had the opportunity to interview emphasized that they inquire about access to weapons during every single threat assessment. They also explained that whenever they conduct a threat assessment, they contact the parents to inform them of the threat assessment on their student, and they ask the parents about the presence of, and their student's access to, weapons at their house. Moreover, the school's security resource officer searches Michigan State Police records to determine whether there are any registered handguns at the student's home.

Once the relevant information from the student's teachers and the individual(s) reporting the concerning conduct, as well as information on the student's background and from the interview of the student is collected,

the threat assessment team identifies whether there is a threat and, if so, the level of the threat. When classifying the threat, the threat assessment form provides options for selecting “low level,” “medium level,” or “high level” threats, which are defined as follows:

- **High Level Threat:** Direct, specific, plausible, and imminent. Student has a detailed plan and the means to carry it out.
- **Medium Level Threat:** Indirect, general, indicates action is forthcoming without details. Student does not have a detailed plan or known or suspected means to carry it out.
- **Low Level Threat:** Vague, indirect, poorly thought-out, or implausible. Student does not have a plan and does not have known or suspected means to carry out a possible attack.

While the 8400 F1 form does not have an option for “not a threat,” the threat assessment team will write-in “not a threat” when they determine that the concerning conduct did not present a threat.

At the high school level, the threat assessment team reports its recommendation to the principal and an SRO for a final determination. The threat assessment team, principal, and SRO will discuss the findings, and the principal and SRO may request that the threat assessment team gather additional facts. Once the principal and SRO believe they have the information needed, they will determine the threat level and appropriate response.

The process is slightly different at the middle school. Unlike the high school, where the principal and SRO determine the threat level after a presentation from the threat assessment team, the middle school team (including the middle school principal) described their threat assessment process as a “collaborative approach” where they collectively decide on whether there is a threat and, if so, at what level.

According to the threat assessment team members with whom we spoke, a typical threat assessment takes around 1.5 hours (ranging from 40 minutes to 2.5 hours). Once the threat assessment is completed, the team recommends a course of action. If it is determined that there was no threat, the student is typically released back to his classroom (if during school hours) or sent home (if the threat assessment went to the end of the school day, which occurs with some regularity). Depending on the conduct, the threat assessment team may determine that the issue did not involve a threat, but nonetheless involved conduct warranting school discipline. In that case, the school’s disciplinary process would apply, which may include suspension. If the threat assessment team identified the threat as “low level” or “medium level,” then the student will be referred for a third-party evaluation and not permitted to return to school until that third-party evaluation is completed. If there is a high-level threat, or if the alleged threat otherwise involved potentially criminal conduct, the matter would be handed over to law enforcement.

#### **d. Threat Assessments Conducted Over Past Year**

The District provided us with copies of 48 threat assessments, twenty of which were conducted during the winter semester of 2022 (January 2022 to May 2022) and 28 of which were completed during the fall semester of 2022-23 (September 2022 to January 2023).

##### **i. Winter Semester 2022 Threat Assessments**

Of the twenty assessments conducted during the winter semester of 2022, 11 of the assessments concluded that the identified conduct presented “no threat.” Of those 11 cases, nine of them were classified as “no threat” because the conduct involved a student expressing potential suicidal ideation without an indication of a threat

to someone else. For these incidents, the threat assessment form states that “a suicide threat assessment action plan” was completed.<sup>107</sup> The other two incidents during the winter semester of 2022 classified as “no threat” involved a student watching a violent video game and a student bringing to school a small toy replica of a rifle, respectively.

Of the remaining nine cases during the winter semester of 2022, seven were identified as a low threat and two as a medium threat. The low threat cases generally involved a student either writing about or verbally mentioning violence or death. Within the context of a threat assessment review, however, it was determined that the conduct did not pose a threat in these cases. Some of the situations involved a student expressing a desire to fight another student out of frustration or a disagreement. In another situation, a threat assessment was conducted based on drawings that depicted violence, which were determined to be cartoons from a television show; in addition, the student had a history of drawing and sharing with friends. On another occasion, a threat assessment was conducted when the school was notified about a concerning social media post, which was determined to be only an historical quote.

There were two threat assessments during the winter semester of 2022 that the threat assessment team classified as a “medium threat,” with each of these instances occurring within a month of the high school’s reopening in January 2022. These situations involved a student referencing the November 30, 2021, incident in a manner suggesting a threat. Both of these students were removed from the school, with one of them transferring to a different school and another one suspended after a hearing before the District’s disciplinary tribunal.

Two recurring themes of the threat assessments that were conducted during the winter semester of 2022 are worth highlighting: (1) the mental health of the students on whom a threat assessment was conducted, and (2) whether threat assessment team indicated that it inquired about access to weapons. As to the first point, of the twenty threat assessments conducted during the winter semester of 2022, seven of the students – or 35 percent of the total – had a mental health diagnosis such as depression, or ADHD, or they had an IEP or other accommodation plan that addressed their mental health. According to a leading expert on school threat assessments, that percentage is consistent with the national average. While the student population that qualifies for some type of special education or accommodation service is 10 to 15 percent of the total student population, this segment of the student population makes up (on a national average) 30 to 40 percent of all threat assessments.

As for the second point, the threat assessment form directs the threat assessment team to inquire about the student’s access to weapons. While the members of the threat assessment team who were willing to speak with us indicated that they consistently asked students as to their access to weapons, the threat assessment forms for the winter semester of 2022 do not confirm that. Of the twenty assessments, the threat assessment forms confirmed that the team inquired about access to weapons in only three of them, or 15 percent. If the threat assessment teams inquired about access to weapons (as they state they did), it is important that it be documented on the threat assessment forms (which it was not).

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<sup>107</sup> The Oxford Community School district did not provide Guidepost with copies of suicide threat assessment action plans.

## ii. Fall Semester 2022 Threat Assessments

The District provided us with copies of twenty-eight threat assessment forms that were completed at the high school for the fall semester of 2022. Of the twenty-eight threat assessments, 17 were identified as “no threat,” 10 as “low level threat,” and one as a “medium level threat.” None of the threat assessments in the fall semester of 2022 identified suicidal ideation, in contrast to the threat assessments conducted in the previous winter semester, where nearly all the “no threat” assessments involved potential suicidal ideation. For cases involving suicidal ideation in the fall semester of 2022, the high school used a “Suicide Lethality Checklist for Youth” to evaluate potential risk factors (such as expression of hopelessness, preoccupation with death, and poor impulse control). Based on this evaluation, a mental health professional would prepare a Suicidal Behavior Reporting Form to document the findings of risk level. In evaluating the potential suicide risk, the Suicide Lethality Checklist does not specifically direct the mental professional to inquire about access to firearms. Instead, it directs the mental health professional to identify, in evaluating any potential suicide plans, what the potential “method” of self-harm is and whether that “method” is available.

During the fall semester of 2022, the 17 threat assessments of “no threat” generally involved impulsive statements that did not indicate a threat (such as a friend joking, “I’m going to kill you, bro” or a student blurting out a transient threat out of frustration), the drawing of a picture without indication of an intent to harm (such as a scary jester face or a machine gun within a piece of art), or a student watching a violent video game. Within context, the threat assessment team determined that the conduct did not present any threat. As for the 10 low-level threats, they typically involved more specific language (“I have a bomb in my backpack” or “I’m going to shoot you”), but within context, it was established that there was no real threat posed to students or staff, with the conduct typically a manifestation of a mental health diagnosis. There was one medium-level threat posed by a student with an emotional impairment, involving harm to animals, where the student was removed from school and directed to secure third-party counseling.

As discussed above, during the winter semester of 2022, 35 percent of the students (seven out of 20) for whom a threat assessment was conducted had a mental health diagnosis. The percentage was nearly identical during the fall semester of 2022: 36 percent of students on whom a threat assessment was conducted (10 out of 28) had a mental health diagnosis.

The threat assessment teams improved significantly during the fall semester of 2022 in documenting that they inquired about access to weapons. While during the winter semester of 2022, the threat assessment teams documented that they inquired about access to weapons in 15 percent of the cases (three out of 20), that improved to 75 percent (21 out of 28) during the fall semester of 2022.

### 6. New Threat Assessment Approach Starting April 2023

During the fall semester of 2022, then-Superintendent Weaver decided that the District would transition from a threat assessment model based on NEOLA’s 8400 policies and forms to one based on an approach developed by SIGMA Threat Management Associates (“Sigma”).<sup>108</sup> During the summer of 2022, the Michigan State Police Office of School Safety (“OSS”) awarded a contract to Sigma to develop and train on a model

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<sup>108</sup> SIGMA was acquired in September 2021 by Ontic, a company that provides enterprise security software.



threat assessment program designed specifically for Michigan schools.<sup>109</sup> The OSS highlighted that Dr. Melissa Reeves, who is the past-president of the National Association of School Psychologists and a threat assessment consultant, would play an integral role in developing the program and conducting the training. In fact, Dr. Reeves provided basic and advanced training on threat assessments to the District staff members, including administrators, counselors, and social workers, in the fall of 2022 and the winter of 2023.<sup>110</sup> According to District officials, all threat assessment team members have attended both courses offered by Dr. Reeves and Sigma.

During her training, Dr. Reeves emphasized that even if a threat assessment model is applied perfectly, an act of violence may still occur, noting that human behavior cannot be predicted with certainty. Nonetheless, she observed that timely intervention can reduce the risk of violence when threatening conduct is reported to, and evaluated by, a multi-disciplinary team that can assess the indicators for violence, relevant context, and the student's mental health. She cautioned, however, that there is no "profile" of a shooter, with research debunking the theory that individuals who commit violence are "loners." Instead, Dr. Reeves clarified, a threat assessment team – one comprising members with different perspectives from mental health, administration, and law enforcement – must take a holistic review of a student and the situation to evaluate whether there is a threat and to intervene as necessary for the safety of the stakeholders.

While the District shifted from NEOLA threat assessment procedures to Sigma, the underlying principles of the approaches are the same, with each guided by the USSS-NTAC's "8-steps" for creating a targeted violence prevention plan: (1) establish a multidisciplinary team; (2) define prohibited and concerning behaviors; (3) create a central reporting system; (4) define a threshold for law enforcement intervention; (5) establish threat assessment procedures; (6) develop intervention options; (7) create and promote safe school climates; and (8) conduct training for all stakeholders.

The District's current threat assessment practices are consistent with these principles. The District's threat assessment team members are from various disciplines, including administration, mental health, and law enforcement. This helps reduce potential "occupational bias," where, for instance, a mental health professional may view conduct one way and a security resource officer may interpret the same conduct differently. A multi-disciplinary team ensures an exchange of perspectives, leading to better decision making. In addition, the District has defined prohibited and concerning behaviors, including identifying imminent and early warnings signs of potential school violence. Further, the District has decided to set a low threshold for threat assessments, conducting threat assessments for any conduct that is "concerning" or "gives one pause," regardless of whether the student directly or indirectly expresses a threat. The District employs a centralized reporting system (with concerning conduct reported to the principal of each building), and it involves law enforcement in the threat assessment process. The District's threat assessment process also engages law enforcement to intervene if there is an imminent threat or discovered weapon. The District also currently has threat assessment procedures, which include (as discussed above) securing the student undergoing the threat assessment and searching the student and his or her belongings, for every threat assessment

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<sup>109</sup> "Michigan School Safety Commission Minutes July 27, 2022," Michigan State Police, State of Michigan, Jul. 27, 2022 (<https://www.michigan.gov/msp/divisions/grantscommunityservices/school-safety/school-safety-commission/commission-minutes/michigan-school-safety-commission-minutes-july-27-2022>).

<sup>110</sup> Guidepost requested to speak with Dr. Reeves in connection with this report, but she declined.

conducted. Still further, the District has identified intervention options, including mental health services (such as from Common Ground or EasterSeals).

The District's current practices promote a safe school climate. According to administrators, staff and students have been encouraged to report concerning conduct to administrators, counselors, or other adult staff members. The district also requests students to identify a trusted adult, which creates bonds between students and the staff, promoting a safe environment. Furthermore, the school posts mental health posters, allowing students to scan a QR code to secure immediate assistance from a counselor or mental health professional. Finally, threat assessment team members have attended threat assessment training, including basic and advanced behavioral threat assessment training from a leading national expert.

While the principles for the Sigma threat assessment model are the same as those applied with the previous NEOLA threat assessment model (as set forth in Policy 8400 and the accompanying guideline and form), a significant recent improvement to the threat assessment process is the school's adoption of Navigate360, a computer software-based system that ensures uniformity, improves recordkeeping, and enables threat assessment teams to quickly gather relevant information. Before Navigate360, the threat assessment teams completed threat assessments on paper, with threat assessment teams not completing the forms with uniformity. For example, some threat assessment teams completed the section requesting an "overall assessment," while others did not; some threat assessment teams identified whether the team inquired if the student had access to firearms, while others did not. With Navigate360, the threat assessment review will follow a flow-chart process, requiring the threat assessment teams to answer specific questions to progress further and to complete the process. Moreover, there is better organization of previously-conducted threat assessments. With the former process, the threat assessments were kept in a binder in the principal's office. With Navigate360, the threat assessment will be stored securely online, allowing threat assessment members to quickly and efficiently review previously-conducted threat assessments to analyze the threat and potential trends.

Navigate360 guides threat assessment teams through application of the Sigma model, which prompts the teams to answer a series of questions beginning with: "Does this matter require immediate police response? Is there imminent danger to person or place?"<sup>111</sup> If the answer is "yes," then the threat assessment team is directed to: (1) alert law enforcement and the security resource officer; (2) notify others who need to know, including potential targets or victims and the crisis team to activate emergency protocols; and (3) to complete a threat assessment. If the answer is "no," the threat assessment team is directed to the next question, which is: "Do you need to run a threat assessment?"

To answer this question, the threat assessment team must address the following three questions:

- Has the person threatened violence, or have they communicated in any way their violent thoughts or intent (writings, class assignments, drawings, blog/social media posts)?
- Are there other behaviors that have raised concern about potential violence, such as sexual assault, dating violence, stalking/cyberstalking, or a domestic violence assault?
- Is there a fearful victim or third-party taking protective action or is there someone concerned about behaviors?

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<sup>111</sup> The Oxford Community School district went "live" with the Navigate360 process in April, and the Guidepost team did not have an opportunity to review the new process in-action before issuing this report, as the school board directed Guidepost to issue this interim report in the spring of 2023.

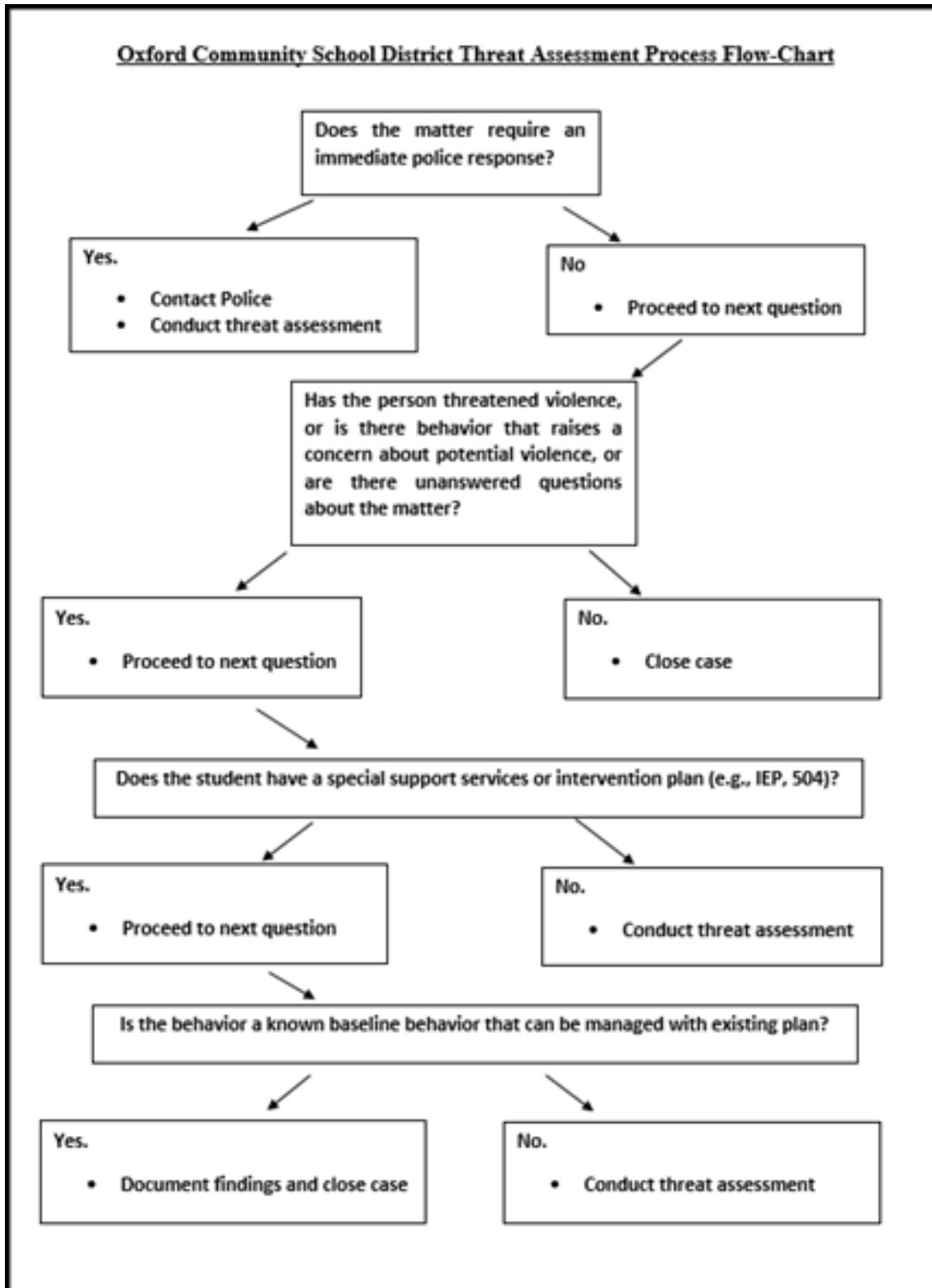
- Is there any other reason to conduct a threat assessment, such as an unanswered question about the matter?

If the answer to each of these questions is “no,” then the Sigma model directs the threat assessment team to close the case. However, if the answer to any of these questions is “yes,” then the model directs the threat assessment team to proceed to the next question, which asks: “Is the student known to have a Functional Behavior Assessment (FBA)/Behavior Intervention Plan (BIP), a 504 Plan, an Individualized Education Program (IEP), or health plan?” If the answer is “yes,” then the team must notify special education personnel to determine if the behavior is a known baseline behavior that can be managed under the existing plan. If the answer to this question is “yes” (i.e., this conduct is a known baseline behavior of the student that can be managed), the threat assessment team documents its findings and closes the case, as the conduct is determined to be a known manifestation of an existing condition for which there is a plan to address it.<sup>112</sup> But if the answer is “no,” then the threat assessment team must conduct a threat assessment and include a special education staff member in the assessment.

To aid the reader, we prepared the following flow-chart outlining the Sigma model process as prompted by Navigate 360, up to the point in the process at which the determination is made as to whether a threat assessment must be done:

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<sup>112</sup> Dr. Cornell observes that this process defers to the special education team as to whether the student’s conduct in this situation constitutes a threat. In Dr. Cornell’s extensive experience, he believes that special education personnel do not prefer to make that judgment independently. Instead, Dr. Cornell suggests that special education personnel collaborate with the threat assessment team to evaluate together whether there is conduct warranting a threat assessment.



When conducting the threat assessment, the Sigma model directs the threat assessment team to gather information from relevant sources, and the District will continue to send emails to each of the student's teachers (and extra-curricular instructors or coaches, as applicable) to gather relevant information on the situation. In organizing and evaluating the information collected from the student, the person reporting the situation, teachers, and others, the model directs the threat assessment team to evaluate the following factors:

1. What first brought the student to someone's attention and what are the student's motives?
2. Has the student made any communications suggesting an intent to attack?
3. Has the student shown any inappropriate interest in school attacks, weapons, or incidents of mass violence?
4. Does the person have the capacity to carry out an act of targeted violence, including access to firearms?
5. Has the person engaged in attack-related behaviors, such as developing plans?
6. Is the student experiencing hopelessness, desperation, or despair?
7. Does the student have a trusting relationship with at least one responsible adult?
8. Does the student see violence as an acceptable or desirable solution to a problem?
9. Is the student's description of the situation triggering the threat assessment consistent with the student's actions and other information collected?
10. Are other people concerned about the student's potential for violence?
11. What circumstances might affect the likelihood the student will engage in violence?

With an evaluation guided by these factors, the Sigma model directs threat assessment teams to focus on the student's behaviors, not his or her traits. Likewise, the Sigma model emphasizes the importance of examining the progression of behavior over time, distinguishing between an isolated incident that within context is not a threat versus repeated concerning behaviors that may demonstrate a potential threat to the student or others.

Once the threat assessment team has gathered and evaluated the relevant information and context, the team must answer the following question: does the student's behavior suggest that he or she is on a pathway toward harming himself or herself or others? If the answer is "yes," then the team must develop a case management plan to address the situation. While Dr. Reeves from Sigma acknowledged that a case management plan is "more art than science," she emphasized that it must be targeted to the situation and the student. When developing the case management plan, the threat assessment team evaluates various options ranging from potential suspension or expulsion, law enforcement involvement, or alternative schooling, to emergency psychiatric evaluation, outpatient counseling referral, academic accommodations, or developing mentoring relationships, all of which depend on the situation. Once the case management plan is established, the Sigma model directs that the student be monitored, with the threat assessment team evaluating whether the case management plan is working or needs to be modified.

If the threat assessment team determines that the student does not pose a threat of violence, it must then consider whether the evaluation nonetheless demonstrates a need for help or intervention, such as mental health care. If the answer is "no," the case is closed; however, if the answer is "yes," then the team develops a "referral and monitoring plan," which involves referring the student to a mental health service and monitoring the student to evaluate whether the plan is working or needs to be modified.

## 7. Evaluation of Threat Assessment Practices

A leading academic expert on threat assessments for schools correctly observed that “[a]s a result of the tremendous fear and concern generated by school shootings, schools need a safe, rational approach to evaluating students who demonstrate potentially dangerous behavior.”<sup>113</sup> While the statistical data reflects that likelihood of a homicide of a student at school is extremely low,<sup>114</sup> school boards and administrators nonetheless must develop policies and practices to identify and remediate potential threats. To this end, “[t]hreat assessment offers an alternative to fear-based, subjective reactions to student threats.”<sup>115</sup>

The District should be commended for having implemented – and provided extensive training on – a robust threat assessment program. Nearly all the current threat assessment team members at the high school – including counselors, social workers, and SROs – were not in those positions in November 2021 when the incident occurred, but instead are either new to the school or to the positions. However, because a number of them declined to meet with us, we were unable to assess whether these current threat assessment team members at the high school want to be on the threat assessment team or are doing so because it is expected or required of them.<sup>116</sup>

As for Oxford’s other schools (OVA, the middle school, and elementary schools), the threat assessment team is formed by each school’s administration (principals, assistant principals, and dean of students, as applicable), as well as mental health professionals (counselors, social workers, and a psychologist), who are principally located at the middle school.<sup>117</sup>

As for the District’s current threat assessment practices, Guidepost has determined that they meet best practices, as outlined by USSS-NTAC and set forth in the relevant academic literature. For instance, the District’s systems ensure that potentially-threatening conduct is reported to a centralized source and reviewed by a multi-disciplinary team, which is critical for ensuring that potential threats are appropriately vetted. The District’s multi-disciplinary teams include administrators, SROs, counselors, and other mental

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<sup>113</sup> Dewey Cornell, *Comprehensive School Threat Assessment Guidelines: Intervention and Support to Prevent Violence* (School Threat Assessment Consultants LLC, 2018).

<sup>114</sup> Dr. Cornell observes that high profile school shootings have “severely distorted public perceptions of . . . the risk of homicide violence to students,” with the probability of such an event at a school being far less than other locations such as restaurants, shopping centers, or residences. See Cornell, Dewey. *Comprehensive School Threat Assessment Guidelines: Intervention and Support to Prevent Violence* at 3 (2018)

<sup>115</sup> Dewey Cornell, *Comprehensive School Threat Assessment Guidelines: Intervention and Support to Prevent Violence* (School Threat Assessment Consultants LLC, 2018).

<sup>116</sup> Of the high school’s six current counselors, only two agreed to speak with Guidepost – Charles Jergler and Michael Brennan. The other four counselors declined to be interviewed. None of the high school’s social workers agreed to speak with Guidepost, nor did the school’s psychologist. School social workers and the school psychologist serve a critical role in threat assessments, especially as it relates to threat assessment of students for whom there is a special services or intervention plan.

<sup>117</sup> Of this group of individuals, the only administrators who agreed to speak with Guidepost were the middle school’s principal and assistant principals and one assistant principal from OVA. Of the middle school’s four counselors, two agreed to speak with Guidepost (Heather Thick and Chris Gill). While a social worker (Lynn Ramos) and a school psychologist (Adam Rainey) at the elementary level agreed to be interviewed by Guidepost, neither the middle school social worker nor the middle school psychologist agreed to speak with Guidepost.

health professionals. With decisions being made from multiple perspectives, there is a reduced risk of bias and a greater opportunity for reaching a reasoned judgment as to whether conduct presents a threat.

The District's new Navigate360 flow-chart system for conducting threat assessments will likely be a significant improvement over the previous process. While Guidepost did not have an opportunity to review the new system in action, given the timing of its implementation and the issuance of this Report, the new system guides the threat assessment team through a series of questions, directing them to inquire as to key factors in the threat assessment evaluation, such as the student's access to weapons or capacity to carry out an attack. This new system reduces the risk that a threat assessment team member will fail to evaluate a critical factor as part of the contextual threat assessment process.<sup>118</sup>

The new system focuses the inquiry on the critical issues: deciding whether there is a threat and, if there is, developing a plan to ameliorate that threat. It eliminates the former process of requiring the threat assessment team to classify a threat as low, medium, or high. According to leading experts on threat assessments, requiring educators to classify a threat as low, medium, or high will generate more discussion than necessary, diverting time and energy from the core issue of identifying whether there is a threat. Moreover, threat assessment teams tend to hedge when given a low, medium, and high scale, classifying threats as "low/medium" or "medium/high," confirming the difficulty of detailing clear dividing lines when characterizing human behavior. When conducting threat assessments, team members want clarity on what they should do next in the process. The Navigate360 decision tree flow-chart accomplishes that, identifying the factors that the team should evaluate to determine whether there is a threat and then, if there is a threat, providing instruction on the steps to take to respond to that threat.

While the District's current threat assessment process meets best practices, there are two principal areas for which there is room for improvement: (1) sustainability of the threat assessment process and (2) creating systems to reinforce a culture of trust and disclosure.

First, the OHS threat assessment team is conducting threat assessments at a rate that is likely unsustainable. Over the past two semesters, the threat assessment team at the high school, for instance, has conducted 48 threat assessments over the past two semesters, where the average for a similarly sized school is no more than 15 assessments per school year. While it is understandable that there would be a period of excessive caution after a tragedy of the magnitude that OHS experienced on November 30, 2021, it is important for the District to transition to a pace that can be maintained. By way of illustration, the high school counselors who were willing to speak with us stated that their time is generally divided into three categories of support: (1) emotional support (which includes threat and suicide assessments); (2) academic support (which includes selecting classes and enrollment); and (3) guidance support (which includes college and vocational guidance). The counselors explained that in a typical high school situation, their workload would be evenly divided (33% on each category). At OHS, however, the counselors indicated that during the fall semester of 2022, they spent approximately 75% of their time on the emotional component (including threat and suicide assessments), 20% on the academic support, and only 5% on guidance. Again, while it is to be expected that counselors would need to address additional time and energy for emotional support for the OHS student body, this model is not

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<sup>118</sup> With the District's implementation of the Navigate360 threat assessment system, the District no longer utilizes the 8400 F1 form, which is referenced in the District's threat assessment administrative guidelines. Those guidelines should be revised to reflect the District's current practices.

sustainable when a substantial portion of counselors' efforts are expended on threat assessments, the substantial majority of which are identified as no threat.

From our review of the threat assessments that the District provided, it is evident that the threat assessment team is evaluating more conduct than necessary. The threat assessment forms we reviewed confirm that there was no threat in over half of the threat assessments conducted. Part of the issue is that isolated conduct is being reported to the threat assessment team that likely should be resolved through the disciplinary process. Of course, the threat assessment team needs to be mindful of trends; isolated conduct that is classified as disciplinary may be viewed differently if there is repeated conduct. With Navigate360, the threat assessment team will have ready access to disciplinary records from which the team can draw appropriate conclusions.

Moreover, many leading threat assessment models recommend that a threat assessment team leader conduct preliminary interviews to make an initial determination of a threat. For instance, it might be readily apparent (within context) that a student's conduct was a joke or a passing expression of anger that can be resolved without a full threat assessment. Having a threat assessment team member initially screen conduct enhances the sustainability of the current threat assessment practices. If there is concern about having a single member make that initial judgment, the screening can be conducted by two team members (rather than the full team) with the direction that the screening team should elevate the concern for full threat assessment review if at least one member of the three-legged stool has any reason to believe that there is a potential threat.

Consistent with this finding, Dr. Willemin, the District's Executive Director of School Operations, informed us that she, along with the School Safety Administrator, intend to conduct the initial review of threat assessments to determine whether there is even potentially a threat, eliminating those cases where there is none. Dr. Willemin explained that she hopes to eventually transition this "screening" role to the principals at the District's buildings. We believe an effective control should include two experts such as the Executive Director of School Operations and School Safety Administrator and one lay person, such as the principals at the District's buildings, with the latter having the administrative responsibility for alerting and facilitating the review process.

Second, the District has an opportunity to create better systems to foster and firmly establish a culture of cooperation and disclosure. Historically, school shooters display sub-acute behaviors that are witnessed by teachers, parents, and fellow students, but many times those red flags go unreported until after the tragic incident. Teachers should be trained to recognize and report sub-acute behaviors that could be signs of a student at risk for self-harm or violence. Some examples of these sub-acute behaviors include the onset of poor hygiene, demonstrating a lack of self-care and disregard for peer acceptance, or no longer interacting with friends, reflecting the possibility of shunning, bullying by exclusion, or self-isolation after being publicly shamed, including on social media. Moreover, every teacher should communicate to their students that they can come to him or her with any personal concern or concern about another student. Building trust is critical.

Likewise, students should be encouraged to recognize and report these behaviors. To that end, students should recognize and report if a student demonstrates an interest in school shootings, or if a student suggests that another student should not come to school on a particular date. Administrators and counselors should help students understand that reporting these incidents to counselors is not "snitching" on their fellow students to get them into trouble but instead is an expression of concern for their well-being that may help and provide support for at-risk students. Schools may want to consider presenting these issues with examples



to the student body by grade in a student assembly or bringing in expert speakers to address the importance of a culture of disclosure.

The District should also direct parents to free online threat assessment training.<sup>119</sup> This would serve two important purposes. First, parents could gain a better understanding as to the difference between a student uttering a transient “threat” out of frustration or emotion and him or her truly posing a threat. This could also help parents understand that students with a mental health diagnosis or a special education or other intervention plan often struggle with impulse control and have a higher baseline level of frustration that may cause them to make careless utterances. Second, parents and caregivers can learn to hone their observations, guiding them to ask thoughtful questions of their children, whose answers may indicate that they could benefit from a meeting with a counselor or more formal mental health services. Like their students, parents should be encouraged to report concerning behaviors and situations to school counselors from the perspective of caring for the students, not informing on them.

As Dr. Cornell explained to us, the culture of a school and community is critical to a well-functioning, effective threat assessment program, which starts with disclosing potentially concerning conduct. One important factor in testing a school’s culture is whether a student identifies a “trusted adult,” which may include a teacher, coach, or even a bus driver or member of the janitorial staff. Where 90% of a student body identifies a trusted adult, that is a sign of a very strong school culture. On the other hand, where only 70% of a student body identifies a trusted adult, that is not a positive sign of a school culture.

By every indication, the District has a strong culture. Based on our interviews, it is apparent that administrators, teachers, and staff care deeply for their students and strive to make connections with them. By way of illustration, since 2018, staff members provide students with individual, handwritten notes of encouragement and support, with every OHS student annually receiving a personalized note from an OHS staff member. From 2018 through 2022, these notes were delivered to students on Valentine’s Day. This year, the staff wrote students notes for Thanksgiving, delivering them to the students just prior to the one-year anniversary of the tragedy.

In March 2023, OHS adopted the practice of requesting students to identify a trusted adult at the school or their favorite teacher. There are 1,661 students at the high school who took the survey. Of them, 235 students (approximately 14%) did not list a trusted adult. Of those 235 students, 215 students identified a favorite teacher. Those favorite teachers were notified which students chose them, enabling those teachers to further develop a connection with those students. The remaining 20 students (approximately 1.2 percent of the student population) who did not identify a trusted adult nor favorite teacher were then assigned to one of the school counselors, who are in the process of doing check-in meetings with these students. This practice has been in place at Oxford Middle School since 2020. At the high school and middle school, the names of students who did not identify a trusted adult within the school are shared with their advisory teachers who were suggested to be that connection with those students. In our interviews with middle school staff, they stated that all middle school students have a trusted adult assigned to them. The adoption of this practice at

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<sup>119</sup> For instance, Dr. Cornell, a leading expert on school threat assessments at the University of Virginia has made available to schools free threat assessment training sessions, with one tailored to students, another to teachers, and a third one for parents. These threat assessment training videos are available at [www.schoolthreatassessment.com](http://www.schoolthreatassessment.com), with each school district entitled to obtain its own codes for the programs.

the middle school three years ago has likely assisted in its adoption at the high school this year. Moreover, Dacia Beazley, who was the previous principal at the middle school and the current principal at the high school, assisted in implementing the “trusted adult” practice at the high school.

In addition to building a culture of trust and disclosure, the District must identify simple reporting systems and then educate its students and their families about those systems. Beyond OK2SAY, this may be providing contact information (including cell phone numbers) of SROs, counselors, assistant principals, or coaches. By way of example, Dr. Cornell provided an anecdote of a student contacting his school’s assistant principal in the middle of the night, identifying concerning conduct of self-harm to a student. With timely intervention, a crisis was averted. Having a culture where a student feels comfortable to text or call an assistant principal, counselor, or SRO is critical for an effective threat assessment program.

Finally, as part of building a culture of trust and disclosure, the District should consider transitioning from describing the process as a “threat assessment.” As a leading expert opined, the term “threat assessment” is ominous, suggesting that each student who undergoes assessment is a “threat.” The District should consider rebranding “threat assessment team” to “safety and support team,” and a “threat assessment” to a “safety interview.”

## 8. Recommendations

While the District’s current suicide intervention and threat assessment policies, procedures, and practices are robust, there is still room for improvement. Guidepost assigned a prioritization level to each observation based on the perceived level of urgency that the observation commands in relation to threat and suicide assessment policies, procedures, and practices. This approach supports a phased review, corrective action schedule, and program that can be adopted by the District to substantiate future fiscal budgeting for corrective action by prioritization. The prioritization rankings assigned per observation are color-coded in the below table:<sup>120</sup>

|   |   |
|---|---|
| <b>Observation 1:<br/>Access to Weapons</b> | From the threat and suicide assessments conducted in 2022 and 2023, threat and suicide assessment teams did not consistently document that they inquired about the student’s access to weapons.   |
| <b>Priority Ranking:</b>                    | <b>Medium High</b>  |
| <b>Recommendation:</b>                      | In every suicide intervention or threat assessment evaluation, the team must inquire about access to weapons with the student and when contacting the parent. This is required by the District’s suicide policy. <i>See</i> PO 5350 (“The first step . . . is to determine if the student has any dangerous instrumentalities.”). The previously used threat assessment form (8400 F1) directed teams to inquiry about the student’s “capacity to carry out plan, including access to weapons.” The Navigate360 system should be programmed to prompt staff to inquire about the student’s and parents’ access to weapons and to document that they did so. |

<sup>120</sup> For further explanation of our priority rankings, particularly with respect to physical security, see the Risk Prioritization Methodology section below.

|  |   |
|--|---|
| <b>Observation 2:<br/>Inclusion of SROs in Assessments</b> | Over the past year, there were several occasions where an SRO was not brought into the threat assessment process.   |
| <b>Priority Ranking:</b>                                   | <b>Medium High</b>  |
| <b>Recommendation:</b>                                     | A critical feature of a threat assessment team is a multiplicity of perspectives, including from an SRO. With the potential of identifying a weapon in a search, and with the importance of having a law enforcement perspective for the safety of students, it is critical that threat assessment teams are reminded – and directed – to include security resource officers in threat assessments and, as applicable, suicide interventions. |

|   |   |
|---|---|
| <b>Observation 3:<br/>Transition to Navigate360</b> | The District is in a process of transitioning from a paper-based threat assessment process, where the completed threat assessments were kept in binders in the building administrator’s office, to an online system known as Navigate360.   |
| <b>Priority Ranking:</b>                            | <b>Medium High</b>  |
| <b>Recommendation:</b>                              | The District should complete the transition of historical threat assessments and suicide interventions into Navigate360. When evaluating potential threats or suicide, context is critical, especially where the student was subject to a previous threat assessment or suicide intervention assessment. With the transition from a paper-based system to an online system, it is important that the District ensure the historical threat assessments and suicide intervention assessments are loaded into the new system. |

|  |   |
|--|---|
| <b>Observation 4:<br/>Threat Assessment Training</b> | The District has provided threat assessment training for its new model to members of the threat assessment teams, including counselors, social workers, administrators, and SROs.   |
| <b>Priority Ranking:</b>                             | <b>Low Moderate</b>   |
| <b>Recommendation:</b>                               | The District should offer training to other staff members, including teachers and other staff who interact with students (such as bus drivers, coaches, cafeteria workers, or janitors). Such training would be tailored to their individual roles, helping them identify and report on signs and behaviors that may suggest a student needs additional support or an intervention. |

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|---|--|
| <b>Observation 5:<br/>Policy/Guideline Alignment with Practices</b> | <p>The district’s suicide intervention and threat assessment practices have evolved over the past year, and the district’s policies, guidelines, and forms have not kept pace. For instance, the District’s “Forms Manual” includes a “Suicide Report Form” (5350 F1) and a suicide assessment form (5350 F2) that the district does not use.</p> <p>As for threat assessment, the District’s Administrative Guideline 8400a identifies a threat assessment process that the District does not currently employ. For</p> |
|---|--|

|                          |   |
|--------------------------|---|
|                          | instance, that administrative guideline provides that threat assessment teams must complete Form 8400 F1, which the threat assessment teams do not currently use and which is no longer included within the District's "Forms Manual."  |
| <b>Priority Ranking:</b> | <b>Low Moderate</b>   |
| <b>Recommendation:</b>   | <p>For transparency to the Oxford community, the District should identify on its Forms Manual the forms that it actual uses for suicide assessments: the Suicide Threat Checklist, the Suicide Lethality Checklist for Youth, and the Suicidal Behavior Reporting Form.</p> <p>The District should revise its guidelines to reflect the threat assessment model currently used (Sigma), as well identify the forms that the threat assessment teams use (if possible with the new threat assessment model).</p> |

|  |   |
|--|---|
| <b>Observation 6: Pre-Assessment Filtering</b> | The District is currently conducting too many threat assessments for conduct that clearly does not present a threat. The District currently conducts 300% more threat assessments than a similar school of its size; that is unsustainable and unnecessary.   |
| <b>Priority Ranking:</b>                       | <b>Low Moderate</b>   |
| <b>Recommendation:</b>                         | We recommend that the District identify, at the building level, one or two trusted members (the principal and SRO) of the threat assessment team who can filter reports of concerning conduct, elevating concerns (such as a substantive threat, repeated conduct by the same student, or fixation on weapons) to the full threat assessment team for review. Doing so will help ensure that the limited resources of threat assessment team members are used on investigating those matters that may present a threat to students and staff. |

|   |  |
|---|--|
| <b>Observation 7: Limiting Searches</b> | Since the November 30, 2021 incident, the threat assessment teams have conducted a search every time there is a threat assessment.   |
| <b>Priority Ranking:</b>                | <b>Low Moderate</b>  |
| <b>Recommendation:</b>                  | The District should continue to evaluate its practices related to conducting searches to ensure a risk-based approach and consistency with District Policies and Guidelines. |

|   |  |
|---|--|
| <b>Observation 8:<br/>Online Information Search</b> | <p>Information in an electronic format that is available to District threat and suicide assessment teams includes electronic school records (through eduCLIMBER) and Gaggle and Go Guardian alerts. However, there is other electronic information that may provide context to a serious threat assessment that could be discovered through a targeted search of a student’s school accounts and a review of available social media.</p>   |
| <b>Priority Ranking:</b>                            | <b>Low Moderate</b>  |
| <b>Recommendation:</b>                              | <p>Where there is conduct reflecting a potentially serious threat, the District should consider utilizing the District’s Information Technology department to search the student’s Google drive and emails for potentially concerning conduct. While Gaggle and Go Guardian are designed to detect potentially concerning conduct, a search of a student’s electronic documents (emails and Google drive) tailored to the concerning conduct prompting the threat assessment could provide additional information and context to properly evaluate and resolve a potential threat. Additionally, the District should consider acquiring a software solution to proactively scan social media accounts for students for whom a threat or suicide assessment is conducted.</p> |

## PART TWO: PHYSICAL SECURITY REVIEW AND RECOMMENDATIONS

## GOVERNING PRINCIPLES AND METHODOLOGY

Guidepost utilized recognized best practices and principles for security assessments of educational institutions when conducting the OCS physical security assessment. We leveraged ASIS International security best practices, standards, and guidelines, as well as our expertise in the security of educational institutions and campuses. Guidepost further uses the Partner Alliance for Safer Schools (“PASS”) Safety and Security Guidelines for K-12 Schools and School Safety and Security Checklist as a basis for all security assessments for educational institutions.

ASIS International’s *Protection of Assets* (“POA”) Manual and Standards and Guidelines serve as the reputable foundations of physical security knowledge.<sup>121</sup> The POA is “designed to be a comprehensive security reference and guide covering a range of professional insights on technical and managerial subjects.”<sup>122</sup> The Physical Asset Protection Standard (ASIS PAP-2021) “utilizes a management systems approach to provide guidance for assisting organizations in the design, implementation, monitoring, evaluation, and maintenance of a physical asset protection (PAP) program. It also provides guidance on the identification, application, and management of physical protection systems (“PPS”) to safeguard an organization’s assets (e.g., people, property, and information).”<sup>123</sup>

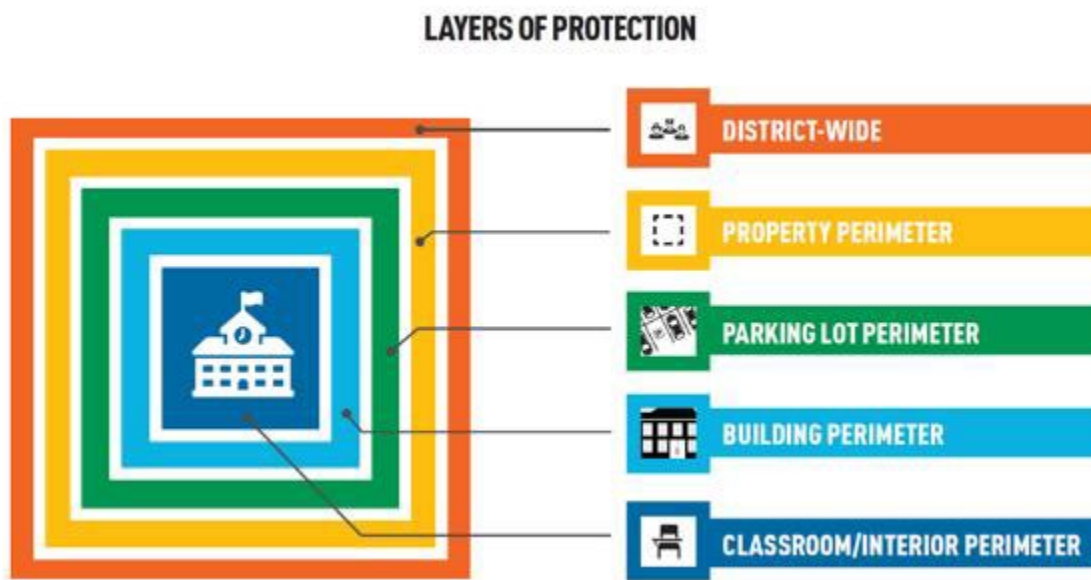


Figure 1: PASS K-12 Layers of Protection /1/

<sup>121</sup> The POA is used as reference material for those seeking the Certified Protection Professional (CPP®) certification.

<sup>122</sup> “POA Online,” ASIS International, 2023 (<https://www.asisonline.org/publications--resources/poa/>).

Using this layered approach, as illustrated in Figure 1 above, in the evaluation of the school's physical security program allows Guidepost to identify situations where risks arising out of failure to implement a certain measure are mitigated by employing another supporting security measure.

Relative to **architectural elements**, Guidepost examines the following:

- Physical security controls
- Pedestrian flow
- Doors, door hardware, locks, and keying systems
- Glazing and windows

Relative to **electronic security systems**, Guidepost evaluates the following:

- Intrusion detection and alarm monitoring systems
- Video surveillance systems
- Visitor management systems
- Electronic access control systems
- Intercom communications / emergency notification
- Weapons screening and detection systems (where present)
- Automated barrier systems (e.g., mechanical and optical turnstiles, revolving doors, etc.)

Relative to **operational security measures**, Guidepost evaluates the following:

- Security policies and procedures
- Security staffing
- Security training
- Emergency preparedness, management, and response

Guidepost's approach also carefully considers Crime Prevention Through Environmental Design ("CPTED") principles and approaches. CPTED focuses on creating an environment that discourages criminal behaviors based on the utilization of CPTED principles to influence and impact certain behaviors. CPTED is a design perspective that layers physical environmental aspects to incorporate security within a campus. The four principles of CPTED are:

- **Natural Surveillance:** ensuring that sight lines are open, and that landscaping is not obstructing views in strategic areas, which could encourage crime or vandalism. The intent is to increase the perception of observation, which can affect and alter the decision-making process for inappropriate or unauthorized behavior.
- **Natural Access Control:** the thoughtful application of environmental designs (e.g., plants, trees, benches) used to "control" or "funnel" access to certain areas.
- **Territorial Reinforcement:** deploying physical attributes that clearly express ownership, such as fencing, signage, or landscaping, or a "public vs. private" delineation.
- **Maintenance and Management:** upkeep of the grounds to invoke a sense of pride and investment within the campus, so people feel this campus is their own, which naturally encourages them to protect the space.

Guidepost approaches educational institution security assessments by reviewing relevant documentation, interviewing stakeholders, conducting daytime and nighttime site surveys, examining the security technology



elements in place, and analyzing the information collected to develop a report describing the current conditions, risk environment, and observations and recommendations. Guidepost utilizes a risk-based approach to ensure that security measures are commensurate with the relevant risk environment and factors in past security events to ensure that the security measures address foreseeability.

**Documentation.** Guidepost requested documentation from OCS and reviewed those documents provided. In general, OCS provided sufficient documentation to permit Guidepost to address critical questions regarding physical, operational, and technical security measures. A list of security and emergency management documents requested and received is provided in Appendix A. In addition, Guidepost also reviewed numerous internal correspondences and conducted open-source information searches related to the security and emergency management measures onsite.

On March 23, 2023, OCS permitted Guidepost Solutions to review the draft District EOP in person with its primary author OCS Executive Director of School Operations, Dr. Allison Willemin. This is a District plan and not a school-specific plan for OHS. OCS explained that once the Board approved the draft District EOP, the school-specific plans would be developed. Due to the impact that public dissemination of the EOP's confidential sections could pose to OCS's security, Guidepost agreed to the following conditions set forth by OCS: 1) Guidepost will review but not take into possession any physical or electronic copy of the EOP; 2) Guidepost will not retain any notes or create any work product in connection with the review of the confidential portions of the EOP, and 3) Guidepost will not report on any substance of the review of the confidential sections of the EOP and will not state what our recommendations were, if any. As it relates to the confidential sections of the EOP, our public reporting will be limited to confirmation that Guidepost reviewed the draft EOP for best practices and made recommendations, if any, consistent with that standard.

**Surveys.** Guidepost conducted physical security surveys of OHS' properties and operations on July 21, 2022; July 22, 2022; January 31, 2023; February 1, 2023; and April 24, 2023. Following the July 22, 2022, site assessment, Guidepost met with OCS administrators to review findings in advance of the 2022-2023 school year. Given the limited time available prior to school starting, we focused on those areas that could be modified in the near-term and those that presented the highest risks.

In addition to daytime surveys, the January 31 survey was conducted in the evening survey to assess afterschool activity, lighting, and other security characteristics. The assessment team reviewed the security technology deployments, functions, use, standards adaptation, monitoring, and command and control (as applicable). We also reviewed the current staffing and monitoring posts based on information made available by OCS, interviews with the contract security firm, and onsite observations.

**Stakeholder Interviews.** Guidepost interviewed individual OHS and District representatives to obtain information regarding security incidents, concerns, philosophies, opinions on security, and data regarding possible security program support processes and school culture. The list of interviewees who voluntarily met to discuss current security measures with Guidepost is provided in Appendix B. Guidepost also interviewed additional stakeholders on related topics.

**Technology Assessment.** Guidepost conducted a review of security systems technology deployed at OHS. Our review takes into consideration the type of technology, effectiveness of the application, operational function, integrations, and maintenance support.

Guidepost compiled its findings and research and then summarized our findings with an emphasis on those areas most relevant for an active shooter situation for inclusion in this Report. Due to the tragic events of

November 30, 2021, Guidepost’s recommendations go beyond those normally recommended for educational institutions to address foreseeability. In accordance with Guidepost’s methodology, the assessment team also conducted a crime analysis and natural risk assessment of the OHS campus and surrounding area. The full results of both are included as Appendices D and E.

# OVERVIEW OF CONDITIONS: Physical Security

## District Profile

The District has approximately 673 staff members, 389 teachers, and 5,900 students of whom approximately 1,700 are enrolled in OHS.<sup>124</sup> OCS consists of one early learning school, five elementary schools, one middle school, and one high school that includes an early college pathway, two alternative schools, and one virtual academy.<sup>125</sup>

The District includes coverage across five townships and two villages in northern Oakland County. It is one of the largest districts by geography in southeastern lower Michigan. The District is on the M-24 travel corridor and 9 miles north of I-75 and 13 miles south of I-69. The area provides relative proximity to the Detroit metro area. The figure below shows the District’s geographical boundaries.<sup>126</sup>

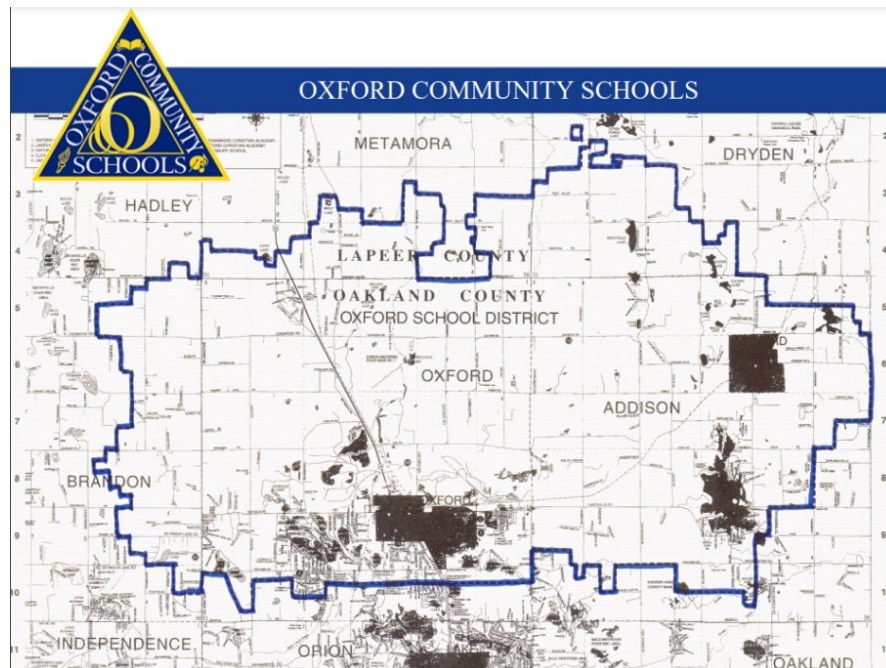


Figure 2: OCS’s District Boundaries

<sup>124</sup> The staff member count does not include teachers. “Oxford Community Schools (63110),” MI School Data, 2023 (<https://www.mischooldata.org/district-entity-view-page/?LocationCode=63110>).

<sup>125</sup> “About Our District,” Oxford Community Schools, 2023 (<https://www.oxfordschools.org/cms/one.aspx?portalId=733838&pageId=1739487>).

<sup>126</sup> “Oxford School District,” Oxford Community Schools, N.d. ([https://cdnsm5-ss8.sharpschool.com/UserFiles/Servers/Server\\_733753/File/District/About%20Our%20District/District%20Maps/boundaries%200.pdf](https://cdnsm5-ss8.sharpschool.com/UserFiles/Servers/Server_733753/File/District/About%20Our%20District/District%20Maps/boundaries%200.pdf)).

## OHS School Profile

The vision of OHS is to create a world-class education today to shape tomorrow's leaders.<sup>127</sup> Its values are Trust, Integrity, Commitment, Collaboration, Honesty, and Accountability.<sup>128</sup> OHS's mission is to provide a world-class education that challenges all students to achieve their maximum potential in academics, arts, and athletics and prepare them to succeed in a global society.<sup>129</sup>

The school offers 20+ sports including bowling, hockey, lacrosse, and skiing and Michigan High School Athletic Association sanctioned programs as well as an array of extracurricular clubs.<sup>130</sup> In addition, OHS hosts the Oxford Dance Conservatory. The campus includes a football field (Wildcats Stadium), natatorium, tennis courts, basketball court, wrestling facilities, weightlifting gym, and baseball and softball fields, among many other sports and recreational facilities. Oxford also has a large Performing Arts Center (PAC), orchestra and band facilities, black box theater, and visual arts installation space as well as an auto shop. As a consequence, the main building and campus are very active after school, in the evening, and at times on the weekend, particularly for groups renting the natatorium or for sports competitions. Guidepost also notes that OCS is a K-12 International Baccalaureate Authorized World School District, offering an IB Diploma program.<sup>131</sup>

## Community Sentiment on Safety and Security

Guidepost understands that OCS engaged in a spring 2022 survey that asked students and Oxford families how they felt about safety and security. OCS has noted in its "Three Year Plan: Reclaiming Our District for Student Success" that OCS aims to improve the safety and security environment at OHS. The results of the spring 2022 survey showed that nearly 3 in 10 students do not feel safe in OHS, and nearly 2 in 10 parents / guardians felt their children were unsafe in OCS. The interview process revealed a general sense of a lack of trust among some members of the community and OCS.

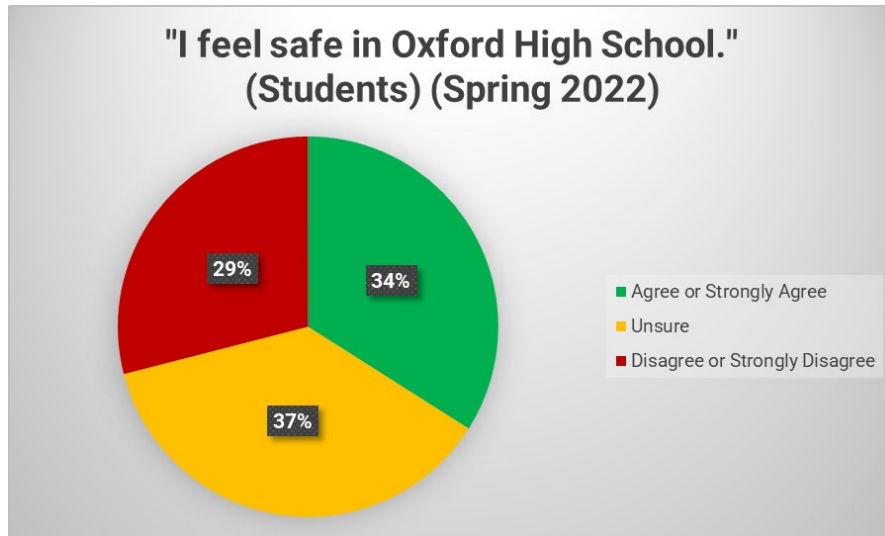
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<sup>127</sup> "Oxford High School," Oxford Community Schools, 2023 (<https://oxfordhigh.oxfordschools.org/>).

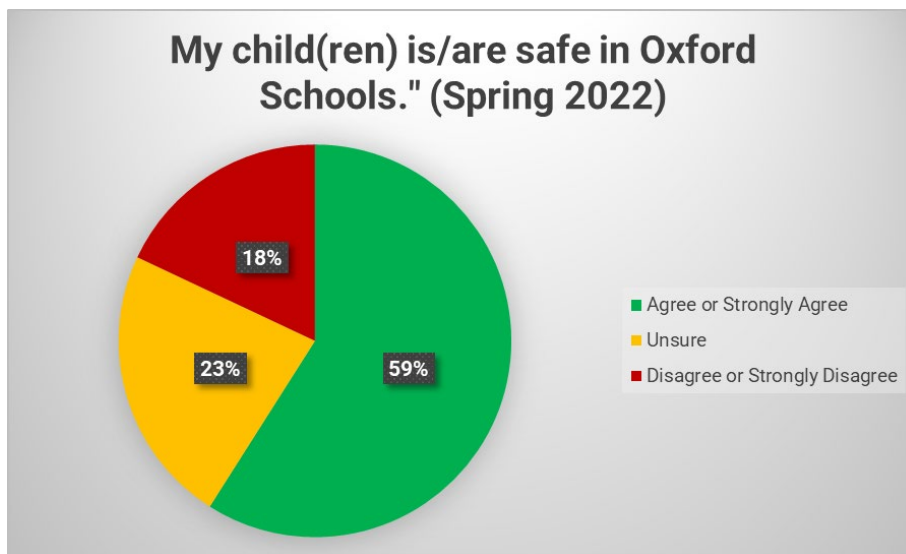
<sup>128</sup> *Id.*

<sup>129</sup> *Id.*

<sup>130</sup> *Id.*



**Figure 3: OHS Student Survey Results for Spring 2022**



**Figure 4: OCS Family Survey Results for Spring 2022**

## Site Overview

OHS is situated between Highway 24 (N Lapeer Road) and N Oxford Road and is immediately south of Ray Road. The closest adjacency is Abby Ride Apartment Homes near E Market Street. A residential area of single-family homes is across the N Oxford Road from OHS. The site is within one mile of Oxford Township Meijer (900 N Lapeer Rd, Oxford, MI 48371) as well as a Chase Bank, Pet Adoption Alternative of Warren, and Tim Hortons. To the south of OHS is also a North Oxford Stor-N-Lock, a self-storage facility. OHS also has three surface parking lots. Two main entry points (front and back) exist to approach the complex by vehicle, both via N Oxford Road off of Ray Road.

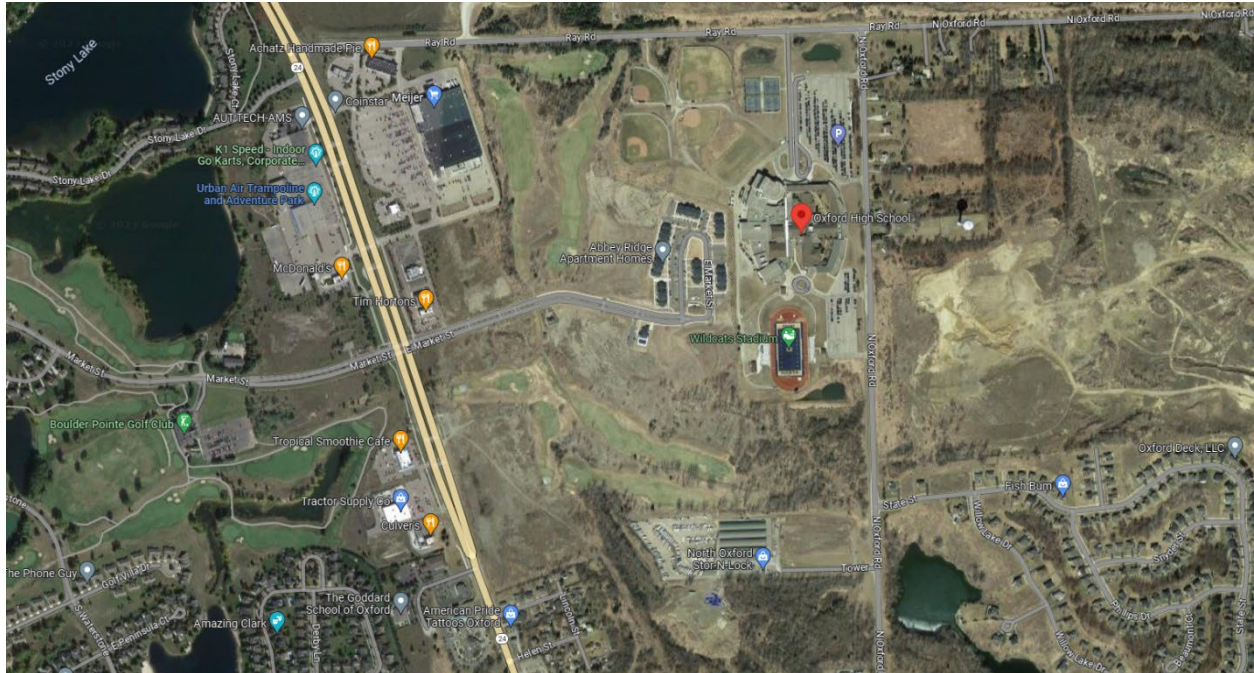


Figure 5: OHS Site Map

## Layout

The OHS complex is a single-story expansive building with a multi-level auditorium. The high school was originally a middle school. In August 2004, TMP Architecture completed the conversion of the building to accommodate 1,600 students through the addition of 262,000 SF, which included the addition of the Performing Arts Center (PAC), natatorium, arena-style gymnasium, and 33 academic classrooms.<sup>132</sup> The intent was to transform the community's impression of the school to acknowledge it as a new high school rather than a retrofit of the middle school.<sup>133</sup> The redesign also added new concession buildings, baseball fields, a softball field, and the football stadium.<sup>134</sup>

<sup>132</sup> "Oxford High School Addition/Remodeling (Oxford, Mich.)," SchoolDesigns, 2023 (<https://schooldesigns.com/Projects/oxford-high-school-addition-remodeling-oxford-mich/>).

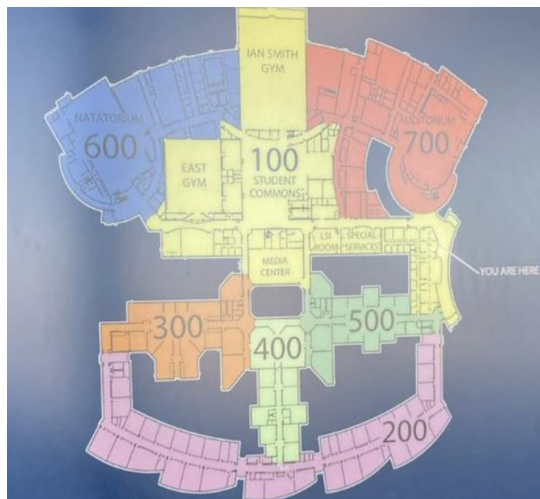
<sup>133</sup> *Id.*

<sup>134</sup> *Id.*



**Figure 6: OHS Campus**

The school is divided into seven wings by number with interior courtyard spaces connected to the 300, 200, 500, and 700 wings as well as a central courtyard between the 300 and 400 wings. The 100 wing includes the Ian Smith Gym, East Gym, Student Commons, Media Center, LSI Room, Special Services, Counselling, and Administration (Main Office). Most people onsite enter via the 100 wing through Doors 1 and 2. Door 2 is considered the Main Entrance for visitors. The 600 wing is home to the natatorium while 700 wing has the PAC, both of which were added during the expansion completed in 2004.



**Figure 7: Map of OHS by Zone**

## Area Risk

Guidepost conducted a natural hazards and crime analysis for the area surrounding the school campus and identified a low-risk environment. Guidepost conducted quantitative analyses and compared OHS's evaluation to schools across the U.S. and identified that its crime risk was lower than the majority of schools. The detailed analyses in these areas are provided as Appendices D and E.

## Lighting Survey

Guidepost also conducted a lighting survey with the use of light meters to determine if dark areas are present on campus. The lighting surveys are conducted to provide a snapshot of site illuminance to identify potential problem areas that may include insufficient illumination, broken or malfunctioning equipment, or general lighting concerns. Per the Illuminating Engineering Society's Guideline for Security Lighting for People, Property, and Public Spaces (IESNA G-1-03), Sidewalks, footpaths, and grounds supporting mass movement of persons should be illuminated to at least an average maintained illuminance of 10 lux (1 fc), with an average-to-minimum uniformity ratio not greater than 4:1, during planned use periods."<sup>135</sup> During the survey, the lighting around the building varied depending on the location of the light level reading. Although the majority of lighting levels taken were above the recommended minimum illuminance level, a number of locations were below the average desired lighting level of 10 lux.

# PHYSICAL SECURITY ELEMENTS

## Perimeter Security

As is customary with most high school campuses, OHS does not have imposing physical barriers around its perimeter, but several measures are present to control access to certain parts of the perimeter. Meaningful physical security measures are not present at the school's perimeter to deter or prevent an active shooter from entering onto school property. This is the case for most schools, and Guidepost acknowledges that the operational environment and high level of activity onsite does not permit the use of highly restrictive barriers.

Vehicle access is only available from Ray and North Oxford Roads. No vehicle access is available from the south or west. OHS uses vehicle barrier arms at the entrance to the perimeter service road, to control access to the western side of the building which is geared more toward service and delivery operations.

During Guidepost's onsite assessment, the assessment team observed the barrier arms present to limit access. Guidepost confirmed the times when the barrier arms are engaged during the school day, afterhours, and on the weekends. When the barrier arm is engaged, access through the entrance lane is limited to individuals with authorized badge credentials via card readers. The barrier arms can also be remotely operated by the office staff if someone requires access and does not have a badge but is being authorized to

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<sup>135</sup> "Guideline for Security Lighting for People, Property, and Public Space," IESNA G-1-03, IES, The Lighting Authority, 2023.



enter.<sup>136</sup> The property does not have a perimeter fence or barrier designed to enclose the property and demarcate the property line. Wooden posts are placed along this path, but these are not rated bollards.<sup>137</sup>



**Figure 8: Perimeter Vehicle Barrier**

**Guidepost Assessment:** In alignment with most high schools in the U.S., OHS has limited perimeter protection measures. As high schools, as opposed to elementary or middle schools, tend to have a significant amount of activity onsite in the evenings and weekends, imposing stringent barriers is inherently incompatible from an operational perspective.

## Glazing

Active shooter events in recent years have highlighted the need to fortify glass entry points and windows on school campuses. Modern architecture for school buildings has focused on providing natural light and visibility both into and out of school buildings, but these elements can negatively impact building security without mitigation measures. OHS previously took measures to address some of these concerns: in January 2020, Michigan Glass Coatings installed 3M™ film to several areas throughout the building. The film was intended to limit visibility into the school building during school hours. According to 3M, the film's manufacturer, the film also helps to hold glass fragments in place when glass is shattered, providing additional personal and property security, and is combined with 3M™ Impact Protection Adhesive Attachment Systems for safety and security.<sup>138</sup>

**Guidepost Assessment:** Having tinted glass to impede the visibility into classrooms or student areas during the school day from the exterior of the building has security benefits. The type of film used onsite, however, has material limitations. Guidepost understands that OCS staff responsible for the implementation and funding of security measures are exploring more robust options for laminate.

<sup>136</sup> *Id.*

<sup>137</sup> Bollards are waist-high cylindrical posts often made of steel or concrete that are anchored to the ground. The intent is to provide standoff distance from a building and provide protection for the building, occupants, and pedestrians in the area. Security bollards are specifically rated in accordance with international standards typically based on the amount of force they can sustain against varying sizes of vehicles at varying speeds.

<sup>138</sup> "3M™ Standard Solar Safety & Security Film S20, 60 in x 100 ft," 3M, 2023 ([https://www.3m.com/3M/en\\_US/p/d/v000215633/](https://www.3m.com/3M/en_US/p/d/v000215633/)).

## Exterior Doors

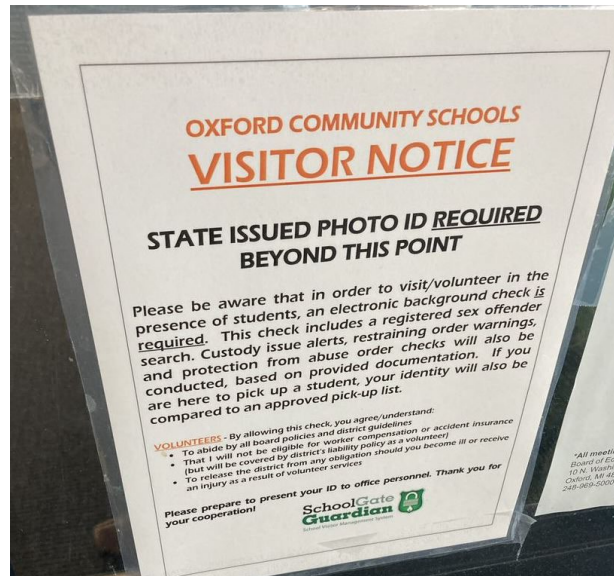
Recent active shooter events targeting schools have again demonstrated the importance of securing and marking exterior doors on campus. A propped door or door whose locking hardware is not functioning properly creates an inherent vulnerability for the campus. The OHS building has exterior doors both from the public side and internal to enclosed courtyard areas. Guidepost identified door position contacts on most exterior doors and is aware of alerts established to inform security when a door is left open. Staff have access to the video intercom to screen people in advance of opening specific doors.

Guidepost also noted the expansive video surveillance coverage including exterior doors and entries. The District has also taken care to update the numbering of the exterior doors to direct first responders to specific areas of the building and added numbering on interior doors to help staff and students direct response efforts to the correct location. Classroom numbers are affixed inside the classrooms to help direct response as well. Guidepost noted that due to weather conditions, some of the numbers had been in need of replacement in July 2022. The District acted to address this. Upon review in February 2023, Guidepost noted that the signs were visible and in good condition.

**Guidepost Assessment:** Overall, OHS has implemented methods to both prevent persons from accessing the building from non-designated areas and to alert security staff when this could be occurring. The use of door contacts and the video surveillance system to monitor the status of doors onsite is a positive measure in alignment with best practices. The numbering of doors, particularly exterior doors, throughout the campus is a key element of school security. At the designated doors, it is imperative to ensure that staff are truly vetting people and not automatically allowing people to enter.

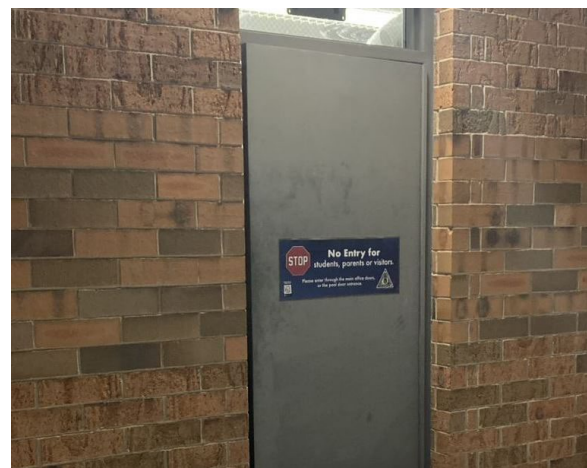
## Exterior Signage

Posting exterior signage can serve to deter unauthorized persons from attempting to access the building surreptitiously. The signage is also a reminder to all on campus that visitors need to check in at the main visitor entrance. This means when someone appears without the proper visitor badge, they are likely to draw the attention of students and staff. Guidepost noted guidance posted instructing visitors of the security practices in place and telling visitors to go to the designated visitor entrance. The signage also denotes specific entry requirements and warns visitors of the review of their backgrounds via government-issued identification check prior to admittance.



**Figure 9: Visitor Notice**

Other exterior building doors that are not to be used as entrances have signs on the public and secure sides of the doors that read, “Stop. No entry for students, parents, or visitors. Please enter through the main office doors or through the pool door entrance.”



**Figure 10: Signage on Exterior Doors**

**Guidepost Assessment:** Signage is one of the most cost-effective measures to deter unauthorized access, and its use is a best practice in school security. While signage alone does not prevent intrusion, it serves to remind persons of the visitor protocols. From a CPTED perspective, it communicates the correct path of entry and makes those who bypass it stand out among the community. OHS has provided consistent signage throughout the campus with clear instructions for visitors.



Figure 11: Doors Not to Be Used for Entry

## Classroom Door Locking Hardware

The operational intent of the classroom lock when functioning in a locked state is to restrict unauthorized accessibility into the classroom. The ALICE guidance, as discussed in more detail in the Operational Security Elements section below, emphasizes that in an emergency situation, if evacuation is not possible, staff and students should barricade entry points into the room.<sup>139</sup> The ability to secure classrooms *from the interior* is one of the most critical elements of school security.

Generally, OHS classroom doors have a standard classroom lock configuration, meaning that their locks are controlled by keys in the outside cylinders, which lock or unlock the outside levers. In general, Guidepost found the door construction to be appropriate for classrooms and offices onsite. These locks can be left in the locked or unlocked state using the keys and cannot be locked from the interior and/or automatically indicate if the doors to which they are installed are locked or unlocked. Similarly, some spaces onsite, including some offices, cannot be locked from the inside.

Classroom locking hardware should not be taken for granted; Guidepost notes that the inability to secure a classroom lock without going outside of the room and using a key is a common vulnerability among most schools. While the classroom doors were originally designed this way to prevent students from locking out teachers and even newly built educational institutions continue to use doors with the same design, the risk environment has changed, and the design has become misaligned with the current security needs. Ideally, classrooms should have a lock that can be engaged from the interior but also indicate to the occupants that

<sup>139</sup> "ALICE: An Easy to Remember Acronym," ALICE Training, Navigate360, 2023 (<https://www.alicetraining.com/our-program/alice-training/>).

the door is locked or unlocked. Classroom security locks are not restricted to classrooms and can be used in any location where key control of the outside lever is required from the inside of the room.<sup>140</sup>

**Guidepost Assessment:** Although OHS utilizes consistent measures to secure doors in a lockdown via the Nightlock® devices as discussed below, this is an area where OHS should take additional measures. As discussed above, locking hardware in classrooms should preferably allow both the ability to lock the door without opening it and a means to see the state of the lock from the inside. As a baseline measure, PASS advocates and Guidepost recommends locking classroom doors while the space is occupied.<sup>141</sup> This does not impede the free egress from the room in the event of an emergency requiring evacuation, such as a fire or interior gas leak. OHS should reassess its primary reliance on the Nightlock® devices and apply classroom security locking hardware.

## Nightlock® Door Barricade Devices

As discussed earlier, when staff and students are unable to evacuate the building in an active assailant situation, they must have a means to secure and barricade the door of the room they occupy. OCS invested in the Nightlock®, a barricade device meant to fortify the doors to classrooms and offices in the event of a lockdown. The governance document most relevant to this device is BUILDING SECURITY AND KEY CONTROL in the Policy Manual Section 7000 Property (PO7440) last revised December 8, 2020. The policy states:

The Superintendent is authorized to install temporary door locking devices as permitted by law in order to protect the health, welfare, and safety of students, staff, visitors and Board property. Notification of the local fire department and law enforcement agency and required inspection in accordance with M.C.L. 388.851d shall be provided before use of the device or system. Training of staff working in the building on the use of the device or system shall be provided and documented.<sup>142</sup>

The Nightlock® door barricade devices have two key models. Nightlock® 1 consists of two metal door plates, one affixed to the floor and the other affixed to the door and a red locking handle. The metal door plates have slats present to allow the device to slide into the metal plates. This is the model used predominantly at OHS.

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<sup>140</sup>Melany Whalin, "Understanding Lock Functions," *Doors & Hardware*, May 2025 (<https://lockdontblock.org/wp-content/uploads/2017/07/Understanding-Lock-Functions-DH-May-2015.pdf>).

<sup>141</sup> *Safety and Security Guidelines for K-12 Schools* (6<sup>th</sup> ed.), Partner Alliance for Safer Schools, 2023 ([https://passk12.org/wp-content/uploads/2023/03/PASS\\_SAFETY\\_AND\\_SECURITY\\_GUIDELINES\\_6th\\_Ed\\_rev.3-21-23.pdf](https://passk12.org/wp-content/uploads/2023/03/PASS_SAFETY_AND_SECURITY_GUIDELINES_6th_Ed_rev.3-21-23.pdf)).

<sup>142</sup> Board Policy po7440 BUILDING SECURITY AND KEY CONTROL, Dec. 8, 2020.



**Figure 12: Engaging Nightlock® 1**

Nightlock® 2 consists of a metal plate affixed to the door and a red locking handle that engages with the metal door frame.



**Figure 13: Nightlock® 2**

The intent is for the Nightlock® red locking handle to be mounted in a clearly marked box next to the door and consistently placed in classrooms and offices throughout the facility to ensure that students and staff know where to find it.



**Figure 14: Red Locking Handle in Designated Box**

Nightlock® advises that as soon as a lockdown is announced, the door needs to be barricaded, and the window shade needs to be engaged to block the view into the classroom. Nightlock® recommends that all staff and students know how to use the device and practice using it, so they are confident in the event of an emergency. The company also recommends practicing using the devices during all lockdown drills. While the red locking handle can be removed by those inside the room, this does not allow free egress as it takes knowledge and additional steps to remove the device.<sup>143</sup>

When asked about whether the devices are accepted by local and state fire codes, the company states:

Some State Fire Marshalls approve devices like Nightlock Lockdown. Most lockdown policy procedures for classrooms include “Barricading the classroom door,” with items such as desks or furniture. Many Fire Code Officials are now applying a variance in the codes to allow temporary barricade devices for emergency events. The variances include that they are portable/removable, have a tool to release the device and/or be defeated by Law Enforcement or First Responders.<sup>144</sup>

Guidepost notes that the Nightlock® barricade devices cannot be used in all jurisdictions due to fire and life safety concerns by not allowing free egress. Guidepost specifically spoke with interviewees on this concern and was assured that the Fire Department had approved the use of the Nightlock® barricade devices onsite. Guidepost notes that specific removal devices allow police and first responders to release the doors when the active threat ceases. Guidepost understands that OHS purchased additional tools to allow first responders to release the doors.

While Nightlock® devices are posted throughout the building, they are not posted at the restrooms due to fire and life safety concerns from the state fire marshal and general concerns about students becoming locked in the restrooms and at risk to assault or abuse. Guidepost reviewed best practices and guidance related to the use of barricade devices for restroom doors in a K-12 environment. In the subsequent report, Guidepost is exploring specific options for the security of these spaces.

<sup>143</sup> A typical “free egress” space allows a person to enter or exit it by pushing a door, pushing a crash bar or turning a door handle, or through any similar one step method.

<sup>144</sup> “NIGHTLOCK® FAQ COMMERCIAL,” NIGHTLOCK® DOOR SECURITY DEVICES, 2023 (<https://nightlock.com/faq/nightlock-faq-commercial/>).

**Guidepost Assessment:** The primary ability to secure a classroom door should come from the classroom lockset. Any placement of secondary locking devices should be considered carefully, particularly in terms of potential liability, fire and life safety, and Americans with Disabilities (ADA) concerns. Nightlock® promotes its device as providing an *extra* layer of protection during a lockdown situation, indicating that the intent is not to rely solely on the Nightlock®. A situation could arise where the Nightlock® device is not present or purposely removed, in which case an additional method is essential to secure the door. In other words, the Nightlock® device should only be used as a secondary locking measure, and the primary locking function should come from the classroom door locking hardware already on the door. Further, Guidepost has fire and life safety and ADA concerns for the placement of Nightlock® devices, particularly in high-occupancy areas.

## OPERATIONAL SECURITY ELEMENTS

### Security Governance

Guidepost reviewed OCS's Board Policies and Guidelines and identified those most relevant to the physical security and emergency management for OHS. A full list of Board documents reviewed is provided in Appendix C.

### Key Control

Proper key control is an essential element in operational security for educational institutions and in ensuring that prior affiliates who are no longer authorized do not access the building via legacy keys or credentials. The security of master and grandmaster keys is often a challenge as well. All educational institutions should ensure that only authorized persons can unlock perimeter doors.

The current hard key control process is manual in nature and managed by OHS principal's secretary. Key control is addressed in BUILDING SECURITY AND KEY CONTROL in the Policy Manual Section 7000 Property (P07440) last revised February 21, 2023. The policy states:

The District Committee shall establish and implement an effective key control distribution process to provide secure access to all Oxford Community Schools buildings. The distribution process will provide guidance to:

- A. Control all Oxford Community Schools District keys;
- B. Provide an effective process for distribution of keys;
- C. Develop a key approval process;
- D. Establish a process for key retrieval upon employment termination;
- E. Communicate how to manage lost or stolen keys; and
- F. Designate key-issuing authority.<sup>145</sup>

The District enhanced its guidance on the general keying structure and noted three parts to an effective key control system: key distribution process, key tracking system, and stamped patented keys. The policy stated that OCS uses a restricted keyway system that allows OCS to cut its own keys. The document clearly states

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<sup>145</sup> Board Policy po7440 BUILDING SECURITY AND KEY CONTROL, Feb. 21, 2023.



that master or grandmaster keys will be issued based solely on actual need, not desire or ego: “The fewer masters or grandmaster keys issued, the fewer problems arise from lost or stolen keys.”<sup>146</sup>

With the update to the administrative guideline, the District moved to a tighter control of the keys onsite via the Director of Maintenance and Operations and a Primary Key Controller.<sup>147</sup> While the District relies upon electronic access control for exterior doors, the policy manual also states, “Keys are necessary as a back-up system and will still be required to operate many interior doors within each building.”<sup>148</sup> This system is noted in the updated administrative guideline along with specific key control measures.<sup>149</sup> The administrative guideline also requires an audit to be done on the key cabinet every fall.

**Guidepost Assessment:** The District made significant improvements to its key control system with the update of the administrative guideline in February 2023 and in its expansion of electronic access control. The inherent challenge with brass keys is that if a key is lost, stolen, or inappropriately retained, the locks need to be rekeyed. This is a costly and complex undertaking. If this occurs with a master or grandmaster, the process is even more complex and expensive. In general, the movement to electronic access control for exterior doors, as OHS has done, is highly beneficial to ensure that access can be revoked quickly without the need to return a badge or credential. This should not be relied upon entirely as brass key backups are beneficial, but in general, the movement to an electronic access control system is preferred.

## Homeland Security Guidance

Staying up to date on national emergency management and homeland security requirements and best practices is important to maintaining school security measures in alignment with the current risk environment. U.S. government agencies and departments have resources for security for educational institutions and offer measures to remain current on the threat environment impacting schools. Guidepost noted that two District administrative guidelines on Homeland Security are out of date with the U.S. DHS Guidance. Administrative Guideline 8420C HOMELAND SECURITY ADVISORY SYSTEM ALERTS (Adopted Mar. 1, 2011) and Administrative Guideline 8420D HOMELAND SECURITY TERRORIST ALERT CODE CHECKLIST (Adopted Mar. 1, 2011) both refer to systems no longer in use by DHS. The National Terrorism Advisory System (NTAS) is designed to communicate information about terrorist threats by providing timely, detailed information to the public.<sup>150</sup> DHS replaced the color-coded alerts of the Homeland Security Advisory System (HSAS) with the NTAS in 2011.

**Guidepost Assessment:** The OCS policy documents should be in alignment with national emergency management and homeland security directives and updated in a timely manner to avoid confusion. In addition, policy and administrative guideline documents need to be updated on a more regular basis to ensure consistency with emergency and security best practices and requirements. An annual review is beneficial to ensuring the documents are up to date.

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<sup>146</sup> *Id.*

<sup>147</sup> *Id.*

<sup>148</sup> *Id.*

<sup>149</sup> *Id.*

<sup>150</sup> “National Terrorism Advisory System,” U.S. Department of Homeland Security, Apr. 15, 2022 (<https://www.dhs.gov/national-terrorism-advisory-system>).

## Governance on Weapons

When armed staff are onsite to provide protection for an educational institution, an appropriate Use of Force Policy is necessary. While having armed staff can provide an immediate response to an active shooter situation, the conditions under which this occurs is essential to campus safety. Measures including how to maintain consistent armed coverage onsite and how to ensure that armed staff appropriately store, maintain, and utilize a firearm are needed. In addition, firearms onsite can raise liability concerns and present opportunities for accidents or misuse of weapons even with the best controls and training. The decision to have armed response onsite should be made upon a risk-based evaluation.

The District has one administrative guideline and seven policy documents that relate to the presence of weapons onsite:

- Administrative Guideline 5772 WEAPONS (Adopted Mar. 1, 2011);
- Policy 3217 WEAPONS (Adopted Aug. 27, 1996, Revised June 8, 2021);
- Policy 4217 WEAPONS (Adopted Aug. 27, 1996, Revised June 8, 2021);
- Policy 5772 WEAPONS (Adopted June 1, 2004, Revised Mar. 16, 2016);
- Policy 7217 WEAPONS (Adopted June 1, 2004, Revised June 8, 2021);
- Policy 8142.01 WEAPONS (Adopted Oct. 25, 2016);
- Policy 9150.01 DANGEROUS WEAPONS (Adopted Aug. 28, 2007); and
- Policy 8400 SCHOOL SAFETY INFORMATION (Adopted Apr. 1, 2004, Revised June 8, 2021).

Administrative Guideline 5772 WEAPONS specifically states that “the District prohibits students, staff and visitors from possessing, storing, making, or using a weapon in any setting that is under the control and supervision of the District for the purpose of school activities approved and authorized by the District including, but not limited to, property leased, owned, or contracted for by the District, a school-sponsored event, or in a District vehicle without the permission of the Superintendent.”<sup>151</sup>

Policy 4217 WEAPONS addresses support staff and includes the same provisions but includes exceptions to the policy, specifically weapons under the control of law enforcement or security guard; items approved by a principal as part of a class or individual presentation under adult supervision if used for the purpose of and in the manner approved (Working firearms and ammunition shall never be approved.); theatrical props that do not meet the definition of “weapons” above used in appropriate settings; and starter pistols used in appropriate sporting events.<sup>152</sup>

The Weapons Policy Manual Section 7000 Property (PO7217) last revised June 8, 2021 states that the Board prohibits visitors from possessing, storing, making, or using weapons on any setting that is under the control and supervision of the Board including but not limited to, property leased, owned, or contracted for by the Board, a school-sponsored event, or in a Board-owned vehicle. This document also provides exceptions for weapons under the control of law enforcement personnel or a security guard. The document also further provides exceptions for parents or legal guardians dropping off or picking up students from a vehicle, corrections, police, security officers, and other law enforcement under specific circumstances, and for retired police or law enforcement if the person has received county sheriff approved weapons training.<sup>153</sup>

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<sup>151</sup> Administrative Guideline 5772 WEAPONS, Mar. 1, 2011.

<sup>152</sup> Board Policy po4217 WEAPONS, Jun. 8, 2021.

<sup>153</sup> Board Policy po7217 WEAPONS, Jun. 8, 2021.

Policy 8142.01 WEAPONS (Adopted Oct. 25, 2016) addresses operations and includes the same provisions but specifically refers to persons who are under contract. This includes owners and employees of entities who contract directly with the District or with a third-party vendor, management company, or similar contracting entity, to provide food, custodial, transportation, counselling, or administrative services to the District.<sup>154</sup> This document does not provide an exception for contract security officers under contract with the District; however, Policy 9150.01 which refers to relations states, “The Board of Education will not tolerate the possession of weapons or any other device designed to inflict bodily harm by any visitor while on District property, in a school vehicle or at a school sponsored event. This restriction applies to visitors licensed to possess firearms unless they are serving as an authorized security officer.”<sup>155</sup>

**Guidepost Assessment:** While these documents reviewed collectively provide exceptions to permit law enforcement, security guard, and authorized contract security officer to carry a firearm onsite, the Use of Force language does not address District staff carrying firearms. The District needs to establish clear instruction and guidance on Use of Force and expectations on the storing, maintaining, training for, and use of firearms onsite.

## Emergency Operation Plan (EOP)

Responding to an active shooter situation necessitates clear guidance and robust training for all persons onsite. The risk environment today requires proper guidance, training, and practice on emergency protocols. On March 23, 2023, Guidepost reviewed a draft of the OCS EOP. The plan was then being developed internally by the Executive Director of School Operations. The draft EOP was presented at the April 2023 District Safety Committee Meeting. The District Safety Committee consists of various community members, including representatives from:

- OCS – Principals, Security, Communications, Transportation, Cybersecurity, Nutrition, etc.;
- The Board;
- Oxford Village Supervisor, Police, Fire Department; and
- Parents.

The Board approved the EOP on April 25, 2023. In terms of governance, the intent is to update the EOP at least annually, or more frequently as required. OCS stated that the document will serve as the District’s EOP and provide the overall framework and approach to managing emergencies for OCS. The current plan is a District EOP and not school-specific, but administrators noted that once the District plan was approved by the Board, individual school plans would be developed.

The District plan draws from two other policy documents which discuss emergency planning and support the EOP’s framework. Policy 8402 EMERGENCY OPERATIONS PLAN (Adopted May 28, 2019) provides the governance for the EOP, while the Policy 8420 EMERGENCY SITUATIONS AT SCHOOLS provides broader guidance on emergency preparedness, drills, drill result publication, and cardiac emergency response plan.

Public Act 436 of 2018 (MCL 380.1308b) required that by January 1, 2020, a traditional school district, intermediate school district (ISD), or public school academy (PSA) had to develop an emergency operations plan (EOP) for each school building operated by the districts with input from the public. In addition, the state

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<sup>154</sup> Board Policy po8142.01 WEAPONS, Oct. 25, 2016.

<sup>155</sup> Board Policy po9150.01 DANGEROUS WEAPONS, Aug. 28, 2007.

law included a biennial review of the EOP to be completed in partnership with at least one law enforcement agency.<sup>156</sup>

As outlined in MCL 380.1308b, the EOP developed and adopted must include guidelines and procedures that address the following:

- School violence and attacks;
- Threats of school violence and attacks;
- Bomb threats;
- Fire;
- Weather-related emergencies;
- Intruders;
- Parent and pupil reunification;
- Threats to a school-sponsored activity or event, whether or not it is held on school premises;
- A plan to train teachers on mental health and pupil and teacher safety;
- A plan to improve school building security;
- An active violence protocol;
- Continuity of operations after an incident; and
- A vulnerability assessment.<sup>157</sup>

The Michigan Department of Education (MDE) encourages districts to also include the following elements in their EOPs:

- Safe evacuation and transport of students and staff with special needs;
- A plan for first aid, cardiopulmonary resuscitation (CPR), and automated external defibrillator (AED) training for staff;
- Staff training to recognize signs of trauma;
- Collaboration with local mental health care providers to provide aftercare of students and staff following an incident; and
- Identification of other response and support agency plans that directly support the implementation of this plan (e.g., city or county EOP and/or school EOPs from schools co-located on the campus).<sup>158</sup>

The District's EOP will be available in both electronic format and hard copy (in the event of a power failure). Distribution of the EOP will be limited to a need-to-know basis, and those who receive a copy will be asked to sign to acknowledgement receipt. Access will be further limited by role, school, etc. In addition to the EOP, OCS informed Guidepost that it plans to use the PREPaRE model, designed by the National Association of School Psychologists, to train school mental health professionals and other educators how to best fill the roles and responsibilities on school crisis response teams. This training will be offered by the Oakland

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<sup>156</sup> The Revised School Code Act 451 of 1976, Section 380.1308b, Michigan Legislature, Mar. 21, 2019 ([http://www.legislature.mi.gov/\(S\(ihb5evsxompu4nrqe4ejbiyp\)\)/mileg.aspx?page=GetObject&objectname=mcl-380-1308b](http://www.legislature.mi.gov/(S(ihb5evsxompu4nrqe4ejbiyp))/mileg.aspx?page=GetObject&objectname=mcl-380-1308b)).

<sup>157</sup> *Id.*

<sup>158</sup> Kyle L. Guerrant, "Emergency Operations Plan Review – MCL 380.1308b (Public Act 436 of 2018)," Memorandum, Michigan Department of Education, Sep. 29, 2022 (<https://www.michigan.gov/mde/-/media/Project/Websites/mde/Memos/2022/09/Emergency-Operations-Plan-Review.pdf?rev=8299d8c77bcd4a9381a0edcc2eb34d25>).

Michigan Independent School District (ISD) in the coming weeks.<sup>159</sup> According to Michigan law, the EOP must include a vulnerability assessment. OCS plans to use the vulnerability assessment conducted by the Secure Education Consultants (SEC) Assessment dated March 2022. The public version of this document is available on the OCS website.<sup>160</sup>

**Guidepost Assessment:** The development and approval of the updated EOP is a major step toward aligning with best practices. The planned development of school-specific emergency plans should follow immediately to ensure compliance with OCS policies and regulatory requirements. Guidepost noted that the OCS Emergency flip books are posted throughout the OHS buildings. Once the plans are updated, old flipbooks should be methodically removed to ensure that staff have all updated versions to avoid confusion. Guidepost has previously observed such confusion in educational institutions. Furthermore, all training and drills should reflect the new guidance.

## Emergency Response Measure

OHS experienced firsthand the value of conducting emergency drills and using different methods to test staff and students. Schools use a number of emergency protocols for security emergencies. OCS made a long-term commitment to use ALICE, an emergency protocol focused on key tenets.<sup>161</sup>

- *A – Alert*
  - *Alert is your first notification of danger.*
- *L – Lockdown*
  - *Barricade the room. Prepare to EVACUATE or COUNTER if needed.*
- *I – Inform*
  - *Communicate the violent intruder’s location and direction in real time.*
- *C- Counter*
  - *Create Noise, Movement, Distance and Distraction with the intent of reducing the shooter’s ability to shoot accurately. Counter is NOT fighting.*
- *E – Evacuate*
  - *When safe to do so, remove yourself from the danger zone.*

According to ALICE Training®, 18 million individuals have been trained in ALICE including 5,500 K-12 school districts, and 5,100 police departments.<sup>162</sup> The methodology is widely used in schools, and ALICE was one

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<sup>159</sup> “About PREPaRE,” National Association of School Psychologists, 2023

(<https://www.nasponline.org/professional-development/prepare-training-curriculum/about-prepare/>).

<sup>160</sup> “Oxford Community Schools District Assessment Report,” Secure Education Consultants, Mar. 2022

([https://cdnsm5-ss8.sharpschool.com/UserFiles/Servers/Server\\_733753/Image/SEC%20Common%20Findings%20Summary.pdf](https://cdnsm5-ss8.sharpschool.com/UserFiles/Servers/Server_733753/Image/SEC%20Common%20Findings%20Summary.pdf)).

<sup>161</sup> “ALICE: An Easy to Remember Acronym,” ALICE Training, Navigate360, 2023

(<https://www.alicetraining.com/our-program/alice-training/>).

<sup>162</sup> “ALICE Training FAQ,” ALICE Training, Navigate360, 2023 (<https://www.alicetraining.com/about-us/faq/>).

of the first organizations to develop training specifically focused on active shooter situations for schools. One of the inherent drawbacks is that it is solely focused on active aggressor situations and requires specific training. Guidepost has worked with school districts which are committed to ALICE or use components of ALICE's training. In general, the training is beneficial in that it provides flexibility in response, rather than relying solely on lockdown as had been the protocol for many schools in the past. Staff stated that they felt that the ALICE training positively impacted student response and allowed students to react quickly in emergencies.

The District has been working to become an ALICE certified District. While some interviewees raised concerns about how broad the ALICE training at OHS was for staff and faculty, others who had been affiliated with OHS for longer periods of time commented on how student and staff know what to do because of the prior drills.<sup>163</sup> Even if the drills were announced in advance, security staff suggested that students today would likely opt not to come to school. Gaining participation from students in the drills is challenging given the trauma experienced in 2021; however, OHS needs to be in compliance with regulatory and policy requirements and to ensure that all new and old staff members, freshmen, sophomore, juniors, and seniors are prepared for an emergency situation.

With respect to documenting the safety drills, Po8402 EMERGENCY SITUATIONS AT SCHOOLS states that the Principal shall provide documentation on completed school safety drills posted on the school's website within 30 school days after the drill is completed and is maintained on the website for at least three years.<sup>164</sup>

Guidepost notes that OHS posted school safety drills from March 7, 2019 to November 11, 2021, but no drills were posted beyond this timeframe.<sup>165</sup> In this regard, staff indicated that students had not been in the position to conduct drills due to trauma experienced from the events of Nov. 30, 2021.

In addition to adopting ALICE as an active shooter response protocol, Guidepost understands that OCS plans to adopt the Standard Response Protocol™ ("SRP") from the I Love U Guys Foundation. SRP is based on an all-hazards approach and uses clear, common language to describe five specific actions that can be performed during an incident: Hold, Secure, Lockdown, Evacuate, and Shelter.<sup>166</sup> The SRP will be used in conjunction with (rather than to replace) ALICE training. Guidepost noted observing ALICE signage throughout the building.

**Guidepost Assessment:** The two most common types of active shooter response measures adopted by school districts across the U.S. are ALICE and the Run-Hide-Fight method recommended by the FBI. Both have benefits, but ALICE is specifically developed to provide training for educational institutions. As ALICE does have opportunities for improvement, Guidepost welcomes the use of clear, common language of SRP. Given the various benefits of each response system, it makes sense that OHS is trying to use both, where possible. It is imperative, however, to ensure that the guidance provided to staff and students does not become confusing when the two types of responses are used together. Further, while the commencement of security

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<sup>163</sup> *Id.*

<sup>164</sup> Board Policy po8402 EMERGENCY OPERATIONS PLAN, May 28, 2019.

<sup>165</sup> "School Safety Drills," Oxford High School, 2023

([https://oxfordhigh.oxfordschools.org/administration/school\\_safety\\_drills](https://oxfordhigh.oxfordschools.org/administration/school_safety_drills)).

<sup>166</sup> "Standard Response Protocol 2023," I love u guys foundation, 2023 (<https://iloveugays.org/The-Standard-Response-Protocol.html>).

drills is a challenging process given the trauma experienced by the OCS community, Guidepost recommends that OHS take small steps toward resuming the drills.

## Emergency Equipment

Emergency equipment can play an important role in a school's response to an active shooter or other violent event. Guidepost's review assessed a wide range of OHS's emergency equipment. First, based on recent active shooter events, the use of bleeding control kits or tourniquets prior to the arrival of first responders has been shown to save lives. This equipment serves to minimize blood loss and prevent shock by stopping or delaying a person's bleeding as soon as possible.

During the site surveys, Guidepost noted bleeding control supplies positioned throughout the school hallways. The supplies were wall-mounted units and clearly marked. In 2019, the District also placed bleeding control kits in classrooms and common areas.<sup>167</sup> At the time of our first stakeholder interview in the summer of 2022, all administrators and select staff members were trained in Stop the Bleed methods and tourniquets, according to OCS leadership. The housing for this emergency equipment has tamper ties to indicate misuse or need for replacement.



**Figure 15: Bleeding Control Kits**

Guidepost also observed First Aid Kits and Emergency Eye and Face Wash Stations with signage present.

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<sup>167</sup> 3.8.2023 Heather Shafer and Mary Hanser Interview Memo.



**Figure 16: First Aid and Emergency Eye Wash Station in 700 Wing**

Guidepost also observed automated external defibrillators (“AED”s) throughout the school hallways in accessible cabinets to help those experiencing sudden cardiac arrest. These devices are covered in the Cardiac Response Plan, part of the District’s EOP.

While the State of Michigan has enacted laws that discuss various aspects of AED use,<sup>168</sup> the laws do not govern the number or placement of AEDs in a school building. Michigan Compiled Laws 29.19 Cardiac Emergency Response Plan requires that K-12 institutions adopt and implement a cardiac emergency response plan. The plan must address the use and maintenance of AEDs, activation of a response team, plan for effective communication throughout the campus, a training plan for the use of AEDs (for grades 9 to 12), incorporation into local emergency response systems, and annual review and evaluation of the plan. At the federal level, OSHA standards do not specifically address AEDs in schools or their placement in educational institutions.

The Americans with Disabilities Act (“ADA”) requirements apply to the AED storage cabinets. The federal regulations for ADA Standards for Accessible Design Section: Protruding Objects Section (28 CFR 36, 4.4.1) specifies that “objects projecting from walls with their leading edges between 27” and 80” (685 mm and 2030 mm) above the finished floor (AFF) shall protrude no more than 4” (100mm) into walks, halls, corridors, passageways, or aisles.<sup>169</sup> The ADA has established guidelines for the mounting of AED and other emergency cabinets to provide safety and/or easy access to the equipment.<sup>170</sup>

The AEDs were in wall-mounted cabinets that were clearly marked. Photos of two wall-mounted AEDs are shown below. Interviewees noted five AEDs in the vicinity of athletics areas with two portable units for two full-time athletic trainers. Based on staff interviews, Guidepost understood that the District upgraded and increased the number of AEDs to address cardiac emergencies. OHS has marked the location of AEDs on a floor plan. AEDs are located at the following locations:

<sup>168</sup> “Michigan Bill Search,” Michigan Legislature, 2023

([https://www.legislature.mi.gov/\(S\(4qssknz3sx4l1dtpykp44sdn\)\)/mileg.aspx?page=Home](https://www.legislature.mi.gov/(S(4qssknz3sx4l1dtpykp44sdn))/mileg.aspx?page=Home)).

<sup>169</sup> “2010 ADA Standards for Accessible Design,” ADA, U.S. Department of Justice Civil Rights Division, Sep. 15, 2010 (<https://www.ada.gov/law-and-regs/design-standards/2010-stds/#307-protruding-objects>).

<sup>170</sup> *Id.*



- Activity/Wrestling Room 616
- Media Center Room 115
- Counselling Offices near Room 101
- Hallway outside of the Chemistry Lab Room 229



Figure 17: AEDs

Guidepost noted that all District elementary schools, OVS, OMS, and OHS are MI HEARTSafe certified.<sup>171</sup> The State of Michigan awards the certification to schools that have taken steps to address cardiac emergencies in the classroom. The certification is awarded on behalf of the Michigan Department of Health and Human Services, Michigan Department of Education, American Heart Association, Michigan High School Athletic Association, and Michigan Alliance for Prevention of Sudden Cardiac Death of the Young.<sup>172</sup> To qualify, OHS has to provide a written cardiac emergency response plan (updated annually); cardiac emergency response team with current CPR/AED certifications; at least 10% of staff, 50% of coaches (including 100% of head coaches and 100% of physical education staff) with current completion of a CPR/AED certification course; and a sufficient number of accessible, properly maintained, and inspected AEDs with signage.<sup>173</sup> OHS also had to document the performance of at least one cardiac emergency response drill per year. The certification is valid for three years.<sup>174</sup>

**Guidepost Assessment:** The placement of AEDs and bleeding control kits onsite is a long-term initiative from OCS. Guidepost strongly supports the continuation of AED and bleeding control kit training for the Oxford community and emphasizes the importance of ensuring that these emergency devices are audited at least annually and in compliance with manufacturer or providers' guidelines. Guidepost noted that the kits have tags on them to prevent misuse. While the intent of such tags is clear, they may cause a possible delay in accessing the emergency equipment. In place of a tag, an annunciator and sensors could be placed to provide a silent alert when the housing units are opened.

<sup>171</sup> "MI HEARTSafe Schools in The Spotlight," MI Genetics Resource Center, 2023 (<https://migrc.org/patients-families/mi-heartsafe-schools/mi-heartsafe-schools-in-the-spotlight-2/>).

<sup>172</sup> "Health & Recovery," Oxford Community Schools, Summer 2022.

<sup>173</sup> *Id.*

<sup>174</sup> *Id.*

## Security Roles

Given the current threat environment surrounding educational institutions, having experienced staff with expertise in security and emergency management helps ensure that these issues are prioritized and considered from a resource allocation perspective. Recent events have shown what can happen when dedicated security staff are removed from a site without proper consideration for consequences.

OCS has three designated, full-time security staff members supporting OHS security initiatives and measures in addition to the dedicated SRO assigned to OHS and contract security staff members. The designated armed staff members onsite include the SRO, OHS Security Guard, and contract security officers. In addition, the Director of Cybersecurity and Operational Technology is the primary point of contact for the security technology systems onsite and the main liaison with the District's security integrator and service providers.<sup>175</sup> The District Technician is also the main point of contact for the operation of the electronic access control system. These staff members are also supported by a District Safety Committee which meets semi-annually.

### Executive Director of School Operations

In November 2022, OCS hired Dr. Allison Willemin to serve as the OCS Executive Director of School Operations. The Executive Director of School Operations is on the same organizational level as the Assistant Superintendents of Business and Maintenance, Elementary Instruction, Secondary Instruction, and Human Resources. The Executive Director of School Operations and the Assistant Superintendents report directly to the Superintendent. The primary function of the role is to be “[r]esponsible for supervising basic school operations that support the daily operation of the school district. In addition, the Executive Director will identify and develop strategic solutions to improve efficiency of operations in alignment with the district’s mission and vision, enhancing district programs and processes.”<sup>176</sup>

The role oversees safety and security, nutrition, transportation, pupil accounting, technology, and the officer manager for the Central Office. This role’s essential security and emergency management duties and responsibilities include:

- Supervising the School Safety Administrator and providing oversight, guidance, and direction as appropriate.
- Ensuring compliance with all District safety procedures (i.e., Threat Assessment, Severe Weather, Fire ALICE, Mandated Reporting, etc.)
- Providing supervision and responding to the OK2Say reports in collaboration with the school safety Administrator and assisting with District communications.
- Serving as co-chairperson for the District Safety Committee with the School Safety Administrator.
- Develop a constructive, proactive departmental philosophy, establish attendance, dress, and performance objectives for safety personnel, and develop operations procedures to guide personnel in the performance of their duties.

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<sup>175</sup> As discussed below in more detail, a security integrator designs and installs physical security systems, often sourcing specific products (card readers, surveillance cameras, sensors, panels, etc.) and infrastructure (cabling, conduit, servers, etc.), installing them onsite, managing software licensing, and providing maintenance and upgrade support.

<sup>176</sup> “Executive Director of School Operations,” Oxford Community Schools, Sep. 15, 2022.

The direct reports to this role include Director of Cyber Security and Operational Technology, School Safety Administrator, Director of Curriculum and Instructional Technology, Director of Nutrition Services, Director of Transportation, Enrollment, Pupil Accounting, and the Director of Public Relations.<sup>177</sup>

The education and experience qualifications for the role include:

- Holding a master's degree of higher in the field of administration preferably, with coursework in educational leadership and/or curriculum instruction.
- Valid State of Michigan teaching certificate preferred.
- Minimum of five years of successful teaching experience preferred.
- Demonstrated knowledge of current educational issue and best practices, including but not limited to school safety, student discipline, and school operations.
- Demonstrated leadership and success in staff development with an ability to work effectively with individuals and groups.
- Excellent writing and public speaking skills, outstanding organizational and planning abilities.
- Knowledge in the area of instructional methods and theory.
- Ability to work with businesses and the community to develop effective partnerships.
- Knowledge in the areas of business, operations, and budgeting.
- Knowledge of Emergency Operations Plans and district safety requirements/protocols.
- Outstanding problem solving and conflict resolution skills.
- Excellent leadership skills and desire to work as part of a team.
- Such alternatives to the above qualifications as the Board may find appropriate and acceptable.<sup>178</sup>

Dr. Willemin holds a Bachelor of Science in Elementary Education from the University of North Carolina at Pembroke, Master of Arts in School Administration from the University of North Carolina at Pembroke, and a Doctorate in Education in Professional Leadership, Inquiry, and Transformation from Concordia University.<sup>179</sup>

**Guidepost Assessment:** In reviewing Dr. Willemin's credentials and meeting with her, Guidepost was reassured by both her expertise in emergency management for the educational sector and her strong passion for school safety and security. The role of the Executive Director of School Operations, however, encompasses a wide array of differing responsibilities, which may at times take focus away from safety and security. Guidepost understands that this was the rationale for the creation of the School Safety Administrator role.

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<sup>177</sup> Allison Willemin Interview Memo.

<sup>178</sup> "Executive Director of School Operations," Oxford Community Schools, Sep. 15, 2022.

<sup>179</sup> "Executive Director of School Operations," Oxford Community Schools, 2023

([https://www.oxfordschools.org/departments/school\\_operations/exec\\_\\_director\\_of\\_school\\_operations](https://www.oxfordschools.org/departments/school_operations/exec__director_of_school_operations)).

## School Safety Administrator

In 2022, OCS created the role of School Safety Administrator. The current School Safety Administrator James Vernier joined OCS on October 24, 2022.<sup>180</sup> This role reports to the Executive Director of School Operations, and its primary function is to “work in collaboration with District leadership and school administration to establish appropriate regulations, procedures, and plans to promote safe and secure schools, including overseeing District Security staff and all security systems.”<sup>181</sup> While the role of the School Safety Administrator is based at OHS, Mr. Vernier is also tasked with assessing and reviewing security at other District school buildings.

The essential duties and responsibilities for this position include:

- Serve as the school district’s liaison to the Oakland County Sheriffs and Oxford Village Police Department, the Juvenile Justice System, and other related agencies.
- Establish clear lines of accountability and command within the schools’ safety forces.
- Develop school safety plans that would help direct emergency responses.
- Provide training and assistance to site-based administrators in matters of safety and security.
- Develop and facilitate safety and training policies and procedures by overseeing training of security staff on various elements of security and safety including behavior threat assessment, de-escalation strategies, and identifying warning signs of potential danger.
- Develop and implement as part of the new staff orientation process, safety, and security training for all staff before they begin the school year.
- Develop security and safety plans for events that occur outside the school day.
- Training and provide resources to OCS and contract staff that oversee these events.
- Work in conjunction with Technology to manage District camera systems, including bus cameras.
- Establish and maintain a District Safety Program, including:
  - Appropriate lighting and signage;
  - Building safety systems;
  - Building surveillance systems;
  - Manage the OK2Say;
  - Student and personnel identification procedures;
  - Visitor registration and identification procedures;

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<sup>180</sup> “Oct. 21, New OCS School Safety Administrator,” Oxford Community Schools, Oct. 21, 2022 ([https://www.oxfordschools.org/for\\_parents\\_students/2022-23\\_district\\_communications/oct\\_21\\_new\\_o\\_c\\_s\\_school\\_safety\\_administrator](https://www.oxfordschools.org/for_parents_students/2022-23_district_communications/oct_21_new_o_c_s_school_safety_administrator)).

<sup>181</sup> “School Safety Administrator,” Oxford Community Schools, Sep. 15, 2022.

- Maintain the district's Emergency Operations Plan for evacuations, lockdowns, and other crises and manage emergency operations and compliance and implement regular training of all staff on safety procedures and drills;
  - Effective and efficient deployment of safety personnel; and
  - Coordination of services with local, State, and Federal law enforcement and emergency agencies.
- In collaboration with the Assistant Superintendent of Human Resources, recruit, employ, and train safety personnel as required.
  - Supervise district and contracted law enforcement and safety personnel.
  - Participate in relevant training opportunities provided by outside organizations, and professional organizations, in order to stay current with trends in safety and security.
  - Direct the deployment of safety and law enforcement personnel to manage routine operations and emergency situations.
  - Serve as co-chairperson for District Safety Committee with the Executive Director of operations.
  - Develop a constructive, proactive departmental philosophy, establish attendance, dress, and performance objectives for safety personnel, and develop operational procedures to guide personnel in the performance of their duties.
  - Coordinate community-based training programs (stranger danger, bike safety substance abuse awareness, social media, cyber safety, cyberbullying, child trafficking, OK2Say, etc.)
  - Provide updates and reports to the central office leadership team as needed.
  - Perform other duties as assigned.<sup>182</sup>

The education and experience qualifications for this role include:

- Extensive knowledge of state/ local policies and procedures regarding the administration of security and school safety programs.
- Bachelor's degree in related field and/or extensive experience in related field of service strongly preferred.
- Knowledge of application of laws and regulations (ADA, Fire Code, Building Code, OSHA, Drills, Invasion, Fire Alarms, etc.).
- Demonstrated leadership and success in staff development with the ability to work effectively with individuals and groups.
- Ability to communicate effectively verbally and in writing.
- Ability to work as a collaborative team member and ability to establish positive working relationships with district administrators, teachers, staff, students, businesses, and the community members.
- Ability to effectively communicate and present to staff, public groups, and the Board of Education.

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<sup>182</sup> "School Safety Administrator," Oxford Community Schools, Sep. 15, 2022.

- Knowledge of Emergency Operations Plans and district safety requirements/protocols.
- Outstanding problem solving and conflict resolution skills.
- Demonstrated ability to maintain strict confidentiality.
- Flexibility to work some nights, weekends, and during non-business hours as needed.
- Strong work ethic and the ability to make effective decisions in accordance the established policies and procedures.
- Such alternatives to the above qualifications as the Board may find appropriate and acceptable.<sup>183</sup>

Mr. Vernier holds a Bachelor of Science in Criminal Justice from Western Michigan University and completed police academy training at Kalamazoo Valley Community College. He also holds an associate degree in law enforcement from Macomb Community College.<sup>184</sup> Mr. Vernier has served the Oak Park Department of Public Safety since 1998 in many capacities including several years as a School Liaison Officer for the Oak Park School District. In 2014, he was named Sergeant and served at that level until retiring from the police force in 2022.

### **Security Specialist II—At Will Position**

The Security Specialist II—At Will Position has been referred to in the past as the OHS Lead Security Officer or Security Personnel—At Will, a role that specifically supported security operations onsite at OHS.<sup>185</sup> In the current job description, the position is also described as a Safety Liaison.<sup>186</sup> This position reports to the School Safety Administrator and the High School Principal. On November 17, 2022, OCS updated the prior job description for this role from 2018.

Mr. Jim Rourke is the current Security Specialist II and has served in this role since August 2011. Mr. Rourke is a retired police lieutenant. The primary function of the role is still to organize, plan, implement, and maintain a program of school safety and security for the building assigned and to serve as a liaison between administration and public safety authorities for student management.<sup>187</sup> The essential duties and responsibilities for this role include:

- Working with counselling and administration on at-risk student interventions, as assigned.
- Safety and security monitoring and management of interior building, parking lot, and external grounds of school.
- Performing security at offsite functions, such as graduation, as assigned.
- Monitoring security cameras.
- Enforcing all rules under student code of conduct.

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<sup>183</sup> *Id.*

<sup>184</sup> "School Safety Administrator," Oxford Community Schools, 2023

([https://www.oxfordschools.org/departments/school\\_operations/safety\\_and\\_security/school\\_safety\\_administrator](https://www.oxfordschools.org/departments/school_operations/safety_and_security/school_safety_administrator)).

<sup>185</sup> "Position Description Security Personnel," May 30, 2018.

<sup>186</sup> "Security Specialist II—At Will Position," Oxford Community Schools, Nov. 17, 2022.

<sup>187</sup> *Id.*

- Assisting in safety and security planning and requirements for building/district.
- Attending necessary trainings, preparations to assist in the management of emergency situations (i.e., school shooter incidents, command centers, etc.)
- Armed and prepared to respond to an immediate threat to protect students and staff.
- Working with principal or designee to arrange and conduct canine narcotics searches.
- Working with SRO to coordinate safety and security for building.
- Working with local fire, police, and emergency service agencies on school related support issues.
- Establishing and maintaining positive relationships and rapport with students, staff, and parents.
- Delivering passes and escorting students as assigned.
- Transporting and delivering mail and other items locally as assigned.
- Physically intervening to stop altercations.
- Performing other duties as assigned.<sup>188</sup>

With the update to the position description in November 2022, the District removed the responsibility for facilitating the parking permits onsite and added additional duties:

- Oversight of contracted security staff at all buildings.
- Coordination of special events coverage with contracted security.
- Remaining in communication via radio with SRO and Administrative staff.
- Abiding by all school policies, guidelines, and use of force policy.
- Housing, training, deploying, and transporting the District's weapons detection K-9.
- Performing other duties as assigned.<sup>189</sup>

Today, when a threat is identified onsite, the Security Specialist II is contacted, and he searches the relevant student's person, backpack, car, and locker if applicable.<sup>190</sup> He separates the student's belongings and searches his/her person via handheld wand. Under the newly implemented OHS rule, only females would wand other females and vice versa, but the Security Specialist II still supervises the use of handheld wands.<sup>191</sup>

The position lists specific qualifications:

- Law enforcement background and/or experience (preferred to have been sworn in with badge).
- Ability to effectively communicate with students, school staff, community, and public safety authorities.
- Ability to physically manage student altercations.
- Experience with crowd control/security.

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<sup>188</sup> "Security Specialist II—At Will Position," Oxford Community Schools, Nov. 17, 2022.

<sup>189</sup> *Id.*

<sup>190</sup> Jim Rourke Interview 1.4.23.

<sup>191</sup> *Id.*

- Awareness of variety of illegal substances.
- Ability to work with administration, staff, community members, students, and safety/security personnel in a cooperative manner.
- Appropriate training and preparations to meet position requirements.
- Ability to use/learn related technology tools (i.e., security cameras).
- Such alternatives to the above qualifications as the Board may find appropriate and acceptable.<sup>192</sup>

### **Contract Security Staff**

When seeking to include private security officers onsite, schools should consider the ASIS International *Private Security Officer Selection and Training Guideline (ASIS PSO-2019)*. The guideline provides a basis for an organization to develop its private security officer selection and training policies, practices, procedures, and program and/or demonstrate that they are consistent with applicable legal, regulatory, and contractual obligations in the jurisdiction where the organization is domiciled and where the security services will be performed.<sup>193</sup>

OCS' current contract security staff members are provided by Fortis Group LLC ("Fortis").<sup>194</sup> The Fortis Group officers are armed and perform various visitor control functions including security screening and visitor badging, in addition to staffing the main doors during school hours. The officers are required to notify Security Specialist II or the SRO when a threat arises and not handle it themselves.

During the arrival process, armed officers staff the Evolv weapons screening stations and work with administrators to address alerts generated by Evolv.<sup>195</sup> Following the screening process, coverage is provided for the front desk while other officers rove the building with specific zones and instructions. At the end of the school day, armed coverage is onsite for the afterschool and evening events.

On February 23, 2023, Fortis and OSC signed a 2.5-year Armed and Unarmed Security Contract (the "Security Contract"), although either party can terminate it for any reason with at least 30 calendar days' written notice.<sup>196</sup> Fortis had responded to the January 27, 2023 Request for Proposal ("RFP"), and the specifications of the RFP had been incorporated into the Security Agreement.<sup>197</sup> Under the Security Agreement, Fortis is required to provide security officers who meet the following requirements for training and experience:

- Prior law enforcement, public service, first responder, or military experience;
- School safety officer training;
- Michigan Commission on Law Enforcement Standards (MCOLES) Training;
- Training in de-escalation and appropriate use of force; and

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<sup>192</sup> "Security Specialist II—At Will Position," Oxford Community Schools, Nov. 17, 2022.

<sup>193</sup> *Private Security Officer Selection and Training Guideline*, ASIS PSO-2019, ASIS International, Inc., 2019 (<https://www.asisonline.org/publications--resources/standards--guidelines/ps0/executive-summary/>).

<sup>194</sup> Guidepost understands that OCS recently switched security staffing providers from Eternal Security Services LLC (ESS).

<sup>195</sup> For further details on Evolv, see the Security Technology Elements section below.

<sup>196</sup> "Service Contract for Fortis Group, LLC and Oxford Community Schools," Feb. 23, 2023.

<sup>197</sup> *Id.*



- First Aid, CPR, AED, and ALICE training<sup>198</sup>

Fortis also agreed to provide OSC with records of training and experience for each employee and agent assigned to provide services annually and when requested by OCS,<sup>199</sup> and ensure that all armed School Safety Officers are in compliance with the Private Security Business Security Alarm Act, MCL 388.1051 et seq.<sup>200</sup> The agreement included specific requirements regarding the carrying of weapons onsite and safety requirements.<sup>201</sup>

According to Guidepost's research, Fortis was formed in Michigan on October 25, 2010. Its current identification number is 801573226. Its former identification number was D49905. The company received its Security Guard Agency license on January 4, 2023 and is considered active.<sup>202</sup> Fortis also holds a Professional Investigator Agency license that was issued on April 28, 2020 and will expire on April 30, 2026.<sup>203</sup> This means that while the company has worked in the investigation space since 2020, this is the first year it has operated as a security guard agency in the state of Michigan. Guidepost understands, however, that the company is supporting other school districts in Michigan as well. Guidepost received notable cooperation from Fortis throughout our review and was encouraged by its professionalism.

**Guidepost Assessment:** Staff reported that the transition in security contracting organizations has been positive, and the organization provided the requested documents and agreed to be interviewed for this Report. Guidepost notes that an opportunity exists to establish key performance indicators and metrics for the security contractor. These help to hold contracting organizations accountable on an engagement and drive professionalism and best practices.

### Director of Cybersecurity & Operational Technology

The main OCS staff member responsible for liaising with the security integrator and security service providers is the Director of Cybersecurity & Operational Technology. This role reports to the Executive Director of School Operations. Mr. Saso Vasovski has served in this role since June 2022. Previously, he served as the Senior Network Administrator for OCS from June 2019 to June 2022.

**Guidepost Assessment:** Guidepost notes that since taking over responsibility for the video surveillance and other security technology systems, Mr. Vasovski has enhanced the systems and provided sufficient storage for the additional cameras present. Based on available information, Mr. Vasovski is providing reliable support for the District in this area.

### SRO

OHS has a dedicated SRO, who is charged with providing onsite security support and assistance with criminal matters that may impact the school. The current OHS SRO is a member of the Oakland County Sheriff's Department. Guidepost reviewed the 2021 to 2022 District School Resource Officer Interlocal Cooperation

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<sup>198</sup> *Id.*

<sup>199</sup> *Id.*

<sup>200</sup> "Service Contract for Fortis Group, LLC and Oxford Community Schools," Feb. 23, 2023.

<sup>201</sup> *Id.*

<sup>202</sup> "Licensed Professional Information: Security Guard Agency 3801300645," Department of Licensing and Regulatory Affairs, 2023 (<https://aca-prod.accela.com/MICLEAR/GeneralProperty/LicenseeDetail.aspx?LicenseeNumber=3801300645&LicenseeType=Security+Guard+Agency>).

<sup>203</sup> *Id.*

Agreement between OCS and the Oakland County Sheriff's Department ("OCSD") (the "SRO Agreement"). The name of the program in place for OCSD to provide a police officer to the District is School Liaison Office Program; however, for the purposes of the agreement, the job title of the police officer is SRO.<sup>204</sup> The SRO Agreement describes the purpose of the SRO is "to maintain safe schools, improve school climate, and support educational opportunities for students while serving at the SCHOOL DISTRICT."<sup>205</sup> The key selection characteristics sought for the position include:

- Demonstrates an ability to work with students;
- Possesses people skills and able to successfully negotiate response from students that do not comply with the school District's Student Code of Conduct;
- Has experience as a patrol officer or road deputy; and
- Has the ability to teach.<sup>206</sup>

The role is considered a resource for the District administrators and principals, but the SRO is an employee of the OCSD, not the District. When the SRO is on a District property, the SRO reports to the District's building principal and the Assistant Superintendent of Human Resources in that order, but the SRO is only disciplined by the OCSD.<sup>207</sup> Guidepost understands that the OHS Security Specialist II is tasked with security as it relates to disciplinary matters, and the SRO is tasked with security as it relates to criminal matters.

A practice is currently in place that the SRO will not leave the campus if the Security Specialist II is not there and vice versa. This is a new protocol, under which the Security Specialist II and the SRO will not take overlapping times off and Fortis Group will backfill any armed personnel position. The SRO Agreement provides as follows: "The parties acknowledge the SRO could be called away from the SCHOOL DISTRICT by the TOWNSHIP or the OCSD for other police duties, yet the TOWNSHIP and the OCSD will make reasonable efforts to ensure the SRO is replaced with a temporary SRO during said times and said Officer will immediately report to his or her presence on campus pursuant to the aforementioned Chain of Command."<sup>208</sup> Following the end of the school day, when the SRO leaves, a Fortis School Safety Officer provides coverage. At times when special events take place, additional coverage may also be present.

**Guidepost Assessment:** Guidepost's assessment is that the current security staffing at OHS is appropriate and built specifically to ensure coverage of the screening protocols, monitoring the building, and presence of armed responders onsite.

### District Safety Committee

The District Safety Committee has been operational over the years and includes representatives from the Oakland County Sheriff's Office, Oxford Fire Department, Oxford Police Department, local government officials, District security personnel, administrators, school board members, and parents. The committee meets on a semi-annual basis. Guidepost understands that the committee recently met in April 2023 to review the draft District EOP. Guidepost notes that the *Health & Recovery* Summer 2022 newsletter specifically states

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<sup>204</sup> "Oxford Community Schools District School Resource Officer Interlocal Cooperation Agreement 2021 to 2022," Oxford Community Schools, 2021.

<sup>205</sup> *Id.*

<sup>206</sup> *Id.*

<sup>207</sup> *Id.*

<sup>208</sup> *Id.*

that the committee will be evaluating both Evolv and ZeroEyes products during their trial periods to determine if they will become a permanent part of the safety plan.<sup>209</sup>

**Guidepost Assessment:** The stakeholder groups included in the District Safety Committee are appropriate based on the focus on security, safety, and emergency management.

## SECURITY TECHNOLOGY ELEMENTS

Response to active shooter events often requires the use of security technology, such as video surveillance. In order for appropriate response, the systems must be functioning properly. Having security technology onsite that is non-functional, limited, or degraded makes identifying an attacker or determining the attacker's location much more complicated for first responders.

### Security Integrator

The District relies upon a security integrator to ensure that the security technology systems are properly maintained and functioning as intended. This is a common practice given the often limited in-house security technology and systems expertise at schools. A security integrator designs and installs electronic security systems, often sourcing specific products (card readers, surveillance cameras, sensors, panels, etc.) and infrastructure (cabling, conduit, servers, etc.), installing them onsite, managing software licensing, and providing maintenance and upgrade support. The security integrator for the District is Eagle Security Fire & Life Safety, Inc. (Eagle Security). Eagle Security has been the primary provider of security technology for the District, including card readers, licensing, badge printers, cameras, and other supporting infrastructure.

According to our research, Eagle Security was incorporated in Michigan on July 3, 2012. Its current identification number is 800753567. Its former identification number is 04693U.<sup>210</sup> Research identified an associated Michigan entity, Eagle Security Fire & Life Safety – Detroit, LLC, which was organized on December 18, 2015. Its current identification number is 802014256. Its former identification number is E7669N.<sup>211</sup>

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<sup>209</sup> For further details on Evolv and ZeroEyes, see the Security Technology Elements section below.

<sup>210</sup> "EAGLE SECURITY FIRE & LIFE SAFETY, INC.," Michigan Department of Licensing and Regulatory Affairs, 2023

(<https://cofs.lara.state.mi.us/CorpWeb/CorpSearch/CorpSummary.aspx?token=nBxILn58HwVtv4JMRDwTm1cWblopjmzlgq3FCQzRMH7Z0mRAdeXC1BZ6+dZUWB6fj9MXlclDhMgwmj0nUSa/w07P4LfMBCiHSrwDKTWDgk7UNfRtjYrhfLUZYHWgDctjE72Qbz9vwiR5lxwvieDoi96jy2tciQbfuKpcSviFK5ztu7GAb9gb8tsHl6oaKB8T1Cai3rB1cvP5ZLkDgQDRVFz5R0dWjECvn1I5JJ4o/c6DEXRhTfnor/pvP9OEJNCxmZvQzduQr3fYjluFgR/e9EqpZYLsrSs+HdJjEDFGKvzxIx/j83qIsiyxJyX7zorNYQsmIS5HA/LUyHQ0xlomRuYoEgEITGW>).

<sup>211</sup> "EAGLE SECURITY FIRE & LIFE SAFETY - DETROIT, LLC," Michigan Department of Licensing and Regulatory Affairs, 2023

(<https://cofs.lara.state.mi.us/CorpWeb/CorpSearch/CorpSummary.aspx?token=nBxILn58HwVtv4JMRDwTmwBsdSF1F1x6AfvNR1uxy811699bs5NKBMqxbpED1fdGCOXN5fhrOccQN4QvpgREmNa0pMP23pZJadIXUJdKbb751vCjdGmistx1IG7nsbhUkuPRkk7r5IF6ctT/QqEutlSstawDsN0lvHsmIUK3cCONHH2stx0uQIQmWXzHhWlrhREWAb1hxqoXEh4oIhCJuiJ2Qy6LWkKRavNUaylZaHnge41pCP98WS39/JCjulr5Dw094tkA0OU9bhZ1QoxSTFJfe86k4xXgW5tnGv0lcOP85uKqD07vvX7hx51MoQkqJ9vUVfw1+DtZD8GXz+nzxe67thnQ1p3u>).

**Guidepost Assessment:** OCS has become heavily dependent upon Eagle Security for security technology support. While the Director of Cybersecurity and Operational Technology has taken a more active role in supporting the physical security technology onsite, OCS lacks security system as-built drawings, technology security standards, and supporting documentation for its access control and visitor management systems. This is not necessarily unusual for a school district, but it raises concerns about how the security technology is selected, installed, trained, and maintained onsite. Guidepost encourages the development of more knowledge among District and OHS staff on security technology, working with the integrator to obtain the documentation on OCS's security technology, and using best practices from ASIS and PASS to determine the type and placement of security technology onsite.

## Visitor Management

Visitor management is an important tool for school security. It can be overlooked as a measure to prevent or mitigate an active assailant situation, but this tool can deter higher risk persons from coming onsite, identify persons who bypassed the visitor protocols, and provide awareness to security staff of potential issues of persons onsite.

School Gate Guardian is the visitor management system now in use at OHS. School Gate Guardian, Inc. is a software company founded in 2008 and located in Pennsylvania (Entity No. 3818487) that specializes in school safety through their visitor management platform and a patented door locking solution.<sup>212</sup> Its New Jersey branch (Entity ID No. 0450369888) was incorporated on April 2019.<sup>213</sup> At OHS, the system is used for screening and tracking visitors. School Gate Guardian has the following capabilities:

- Screening for sex offenders;
- Creating customizable unwanted visitor lists;
- Alerting school staff to custodial issues (non-custodial parents attempting to pick up students);
- Creating approved pickup lists;
- Tracking tardy students; and
- Provide reporting capabilities on information housed within the system.

When visitors arrive, they check in at the reception desk and are asked to present a government-issued identification card. The ID card is then scanned by the School Gate Guardian system to obtain the visitor's information which is then entered into the system. Once the information is in the system, it is checked against national databases including the sex offender registry and any localized unwanted visitor lists that have been created. School Gate Guardian states that it compares the identity of the visitor with a national database of over 704,000 registered sex offenders.<sup>214</sup> In the event of a positive match, the system will display the details about the actual sex offender with mug shot, height, weight, eye color, crimes committed, aliases, and bodily markings (scars or tattoos) in order to avoid false positives.<sup>215</sup>

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<sup>212</sup> "Business Search," Pennsylvania Department of State, 2023 (<https://file.dos.pa.gov/search/business>).

<sup>213</sup> "Business Name Search," New Jersey Department of the Treasury, Division of Revenue and Enterprise Services, 2023 (<https://www.njportal.com/DOR/BusinessNameSearch/Search/BusinessName>).

<sup>214</sup> "School Gate Guardian Solutions," School Gate Guardian, 2023 (<https://www.schoolgateguardian.com/>).

<sup>215</sup> *Id.*

If the visitor does not have any alerts on any of the databases, the receptionist/security officer will print an identification badge in the form of a sticky badge to display during the visit. The ID badge contains the visitor's name, the person they are visiting, a barcode, date, and time that the visitor checked in, and picture of the visitor. The visitor then waits until the person they are visiting comes and escorts them to their destination. This process is only in place during school hours.

The software permits a school to create its own customizable "Unwanted Visitor Registry," a list of visitors who are not allowed in the facilities. The registry may include parents with restraining orders, limited visitation rights, protection from abuse orders, or known threats in the community, such as expelled students or drug dealers.<sup>216</sup> A discreet pop-up warning appears when one of these unwanted visitors attempts to enter the facility after scanning their ID.<sup>217</sup> At the time of Guidepost's site visit, OHS did not have a formal list.

Guidepost observed that visitors' identification photos do not always print on their badges properly. When they do not, visitor badges instead display a logo in the place where the visitors' picture should be. Modern visitor management systems often provide the ability to take photos of visitors if their ID photos do not appear correctly or clearly on the badge. Data from School Gate Guardian states that if the image retrieved from the issued ID does not clearly represent the current appearance of the visitor, a webcam can be used to capture a current image.<sup>218</sup> The School Gate Guardian system may also have difficulties with names. When testing it during the Guidepost review onsite, the system did not properly pick up the text from an assessment team member's name and listed his last name incorrectly with the wrong first two letters.

School Gate Guardian creates a system archive of the details of individual visits to the school including dates and times, photos of visitors, who the visitors went to see, and/or where the visitors went. The visitor pass barcodes expire automatically at midnight if the visitor does not check out properly.

While having and using a visitor management system intended for an educational institution environment is beneficial and a best practice for K-12 entities, Guidepost is concerned about the efficacy of this process. The photos taken, even when they appear properly, could not be used for accurate identification. Furthermore, one assessor's photo could not copy onto the badge. A better practice would be to take photos of the visitors rather than taking their photos from their identification cards. This will also enable OHS to obtain more up-to-date and accurate photos of visitors as well. As referenced above, Guidepost notes that the system incorrectly transcribed an assessor's last's name while onsite and was therefore unable to check him against sex offender lists or a watch list.

The School Gate Guardian website states that the system can incorporate time-expiring visitor badge technology.<sup>219</sup> With this technology, a bright red stop sign appears on visitor badges after 10 to 12 hours from the visit, indicating that the badges are expired. This is intended to help prevent visitors from reusing their badges. On Guidepost's visit, however, the badges did not change color, and they appeared to be printed on normal thermal paper as OHS was not using badges with this capability at the time of the survey.

In terms of tracking prohibited persons, OHS has the ability to create a local list or School Gate Guardian can also interface with PowerSchool through an Application Protocol Interface (API) integration. Power School

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<sup>216</sup> *Id.*

<sup>217</sup> *Id.*

<sup>218</sup> *Id.*

<sup>219</sup> "School Gate Guardian Solutions," School Gate Guardian, 2023 (<https://www.schoolgateguardian.com/>).

contains all records on students including demographics, grades, transfer information, attendance, and scheduling, and is generally the main source of information on students. This integration would, for example, provide a beneficial method to screen out students who have been expelled, suspended, or are no longer allowed on the premises in addition to those on a sex offender list. Delays can occur when these systems are not properly integrated or the system is not kept up to date. Furthermore, in order for this to be effective, a documented protocol and workflow are needed to ensure that such persons of concern are not permitted in the building.

District governance to managing visitors onsite is through Policy 9150 School Visitors (Adopted Aug. 28, 2007, Revised Feb. 26, 2008). The policy section states:

The Superintendent or the principal has the authority to prohibit the entry of any person to a school of this District or to expel any person when there is reason to believe the presence of such person would be detrimental to the good order of the school. If such an individual refuses to leave the school grounds or creates a disturbance, the principal is authorized to request from the local law enforcement agency whatever assistance is required to remove the individual.<sup>220</sup>

**Guidepost Assessment:** School Gate Guardian is a well-regarded system, but it is dependent upon staff checking the content it produces to ensure it is correct. Staff must conduct a quality assurance check to verify that the name on the badge matches the identification provided. Both School Gate Guardian and School Roll Call (described below) have integrations and partnerships with student information systems (SIS) and PowerSchool.<sup>221</sup> It may be helpful to ensure full integration into the system. In addition, the system requires specific protocols for how to handle situations where a person is either on a sex offender list or an unwanted list. The protocol has not been formally documented at OHS and primarily relies on contacting a District staff member. How these situations are handled depends on the ability of staff to de-escalate a situation, call for assistance discretely, verify alerts, and respond appropriately. It is highly critical to ensure that OHS maintains an Unwanted List and includes this in School Gate Guardian through a formal process. The capability can help ensure persons who present risk to the school are not permitted entry.

## Student Check-in Process

A student check-in process helps to ensure that current or former students banned from the premises are not allowed back into the building. In recent active shooting situations targeting schools, former students have returned to assault or attempt to assault school communities.

When students arrive at OHS, school staff use a student ID scanner with School Roll Call software. Stations are set up where students enter the buildings via Doors 1, 2, and 17. School Roll Call is a “web-based service developed by School Gate Guardian to track Physical and Virtual Attendance for any classroom.”<sup>222</sup> It is not a separate entity from School Gate Guardian, and no corporate records were identified for it. This system is deployed at school entry times to log student entry after passing through the Evolv weapon detection screening (discussed below).

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<sup>220</sup> Board Policy po9150 SCHOOL VISITORS, Feb. 26, 2008.

<sup>221</sup> *Id.*

<sup>222</sup> “About School Roll Call,” School Roll Call, 2023 (<https://www.schoolrollcall.com/About>).

All students entering the building prior to the commencement of the school day are required to have their IDs scanned or provide their student ID numbers if they do not have their school IDs with them. The staff member or security team member staffing the scanning station completes the scan or manual number input to confirm the student's entry and logs them into the system as present for the school day. The system also provides the ability to check out students by scanning their ID barcode or inputting their ID number. The system can also check out all students collectively. The stations have a barcode scanner to scan student IDs and a keypad for students who forgot their IDs and must input their student ID number.

If students have to leave early for an appointment or other approved reason, they stop at the security desk and sign out with the reasons they are leaving and whether they are returning.

## Entry Control

The development of secure vestibules is a best practice in school security. Three main entry points are used for entry prior to school starting, and all three entry locations utilize the Evolv system. After entry hours, only one door continues to be used as the main entry during school hours. The exterior vestibule door remains unlocked, and the interior vestibule door is locked during this timeframe, requiring people to badge in or be buzzed in by the posted School Safety Officers. Upon entering the exterior vestibule, the person entering can use an Aiphone video intercom to state the purpose for being onsite and request access to the building. OHS staff can vet visitors via the Aiphone master station, which can admit them.

**Guidepost Assessment:** This type of configuration allows staff to verify who is at the door and what their purpose is and visually ascertain if there are any concerns with the individual. This is standard in K-12 institutions and is also satisfactory from a technology deployment and operational perspective.



Figure 18: Main Entrance

## Electronic Access Control System

The electronic Access Control System (ACS) used at OHS is Lenel/S2. This system offers a variety of access control features, including the ability to designate access rights to doors on a user by user and door by door basis.

In addition, the system can create alarm events, event logs and escalation notifications for alarms generated. The system also offers the capability to adjust operation modes depending on threat levels, e.g., “normal operations” and “lockdown.” Customizable reports can also be generated from the system to review access levels, card holder data, and door access and priority levels. These features are common among mid-level to enterprise level access control systems.

A limited number of internal doors across the campus are equipped with card readers and door contacts, often based on the value of equipment in the rooms. Administrative Guideline 7440 BUILDING SECURITY AND KEY CONTROL (Revised Feb. 21, 2023) states:

Controlled access provides the highest level of security for our schools. Thus, our established electronic access card system at exterior doors will remain the primary means by which staff enter District buildings. All Oxford Community Schools staff are expected to wear their assigned badges and it is each staff member’s responsibility to maintain access to his/her designated building(s). Keys are necessary as a backup system and will be required to operate many interior doors within each building.<sup>223</sup>

Access permissions are controlled by District Technician, who can modify settings of doors with silent alarms. These alarms trigger email alerts when an exterior door is held open too long. The District Technician can also remove access from persons. He is the main point of contact for the ACS from a procedural perspective and is in charge of the Power School Student Information System (SIS) which the District switched to using in the fall of 2020.

To set up new credential holders, the District Technician creates new users in Active Directory and enrolls students in Power School. He then creates security badges and maintains the inventory tracking systems. Power School contains all records on students including demographics, grades, transfer information, attendance, and scheduling and is generally the main source of information on students. Nearly all Michigan schools use this platform. Active Directory is not integrated with the access control system, but instead the user is manually created in S2. The District conducts annual review of the ACS and badge holders at the start of the school year with the secretaries. The District Technician exports the list into S2, and the changes are updated.

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<sup>223</sup> Administrative Guideline 7440 BUILDING SECURITY AND KEY CONTROL, Feb. 21, 2023.



**Guidepost Assessment:** In Guidepost’s view, Lenel/S2 is a well-regarded product for access control. While it is not uncommon for educational institutions to use lower grade technology due to lack of knowledge or to save on costs, Guidepost was encouraged that OHS has invested in a reputable and reliable system.



**Figure 19: HID Card Readers**

## Weapons Screening and Detection

### Evolv

Evolv is the weapons screening system used at three entrances to OHS. In August 2022, OCS announced that the District had accepted the opportunity to take part in a free pilot with Evolv.<sup>224</sup> Evolv is one of the most well-known and widely used non-traditional weapons screening systems in the U.S., although the specific number of educational institutions using Evolv is not ascertainable from open-source information. On March 29, 2022, Evolv Technology’s Evolv Express® attained SAFETY Act Designation through March 31, 2027.<sup>225</sup> Evolv Express is used at the three main entry points. During the school day, students involved in athletics are instructed to place their opaque sports bags in blue carts when they check into the building.

Evolv is a contactless screening option that does not require students or staff to empty the contents of their pockets or bags during the screening process unless something is discovered on their person during the screening process. Guidepost is familiar with the operation of Evolv units, and we observed people go through the Evolv screening process while onsite. Based on information made available to Guidepost, our prior experience with Evolv, and site observations, the Evolv units were operational and working as intended.

Evolv is designed to detect ferrous materials that meet specific criteria that most closely resemble handguns, rifles, and other large guns. With the high throughput of the system, it is not intended to alert of smaller weapons. It is possible that at the highest sensitivity setting, some smaller weapons/knives could be detected; however, this should not be relied upon as the only screening method for smaller weapons.

The units at OHS were provided pro bono. Typically, in addition to the unit cost, the system also requires ongoing software refresh and maintenance. As such, it is important to verify the conditions of the Evolv

<sup>224</sup> “Healing & Recovery,” Oxford Community Schools, Summer 2022.

<sup>225</sup> “Evolv Technology,” SAFETY Act, U.S. Department of Homeland Security Science and Technology, 2023 (<https://www.safetyact.gov/lit/at/aa>).

agreement to determine if there is any expiration date to the company's complimentary software updates. The current license agreement provides that its terms will expire 48 months from the effective date (July 22, 2022), at which point they can be renewed, or the parties can agree on new terms through a written consent.

Evolv is also used for large events; for instance, in 2022, OHS used Evolv at its home football games, and the system reported or identified no incidents of people attempting to bring firearms into the event. For football games, Evolv is set up against the fencing where people redeem their tickets. Football games also rely on armed and unarmed officers from the Oakland County Sheriff's Office and contract security officers. OHS has a no re-entry policy to limit the ability of people to return unscreened, and only small handbags and purses are allowed at football games for medical or sanitary purposes, all of which are subject to search.

The biggest challenge for Evolv is maintaining the staffing necessary to run it properly. The Executive Director of School Operations, OCS, and School Safety Administrator are drafting a school policy on the use of Evolv. As with all security sensor systems, nuisance alarms can occur. Managing the flow of student through the Evolv portals, particularly during inclement weather, also remains a challenge.

23Hand-Held Metal Detectors ("HHMD") are also available as another tool to be used in conjunction with the Evolv screening. A traditional metal detector hand wand alarms to the presence of metallic objects on a person or within their belongings.

**Guidepost Assessment:** Given the past security events at OHS, Guidepost supports the use of weapons detection technology, with an understanding that the system will not detect every type of weapon.<sup>226</sup>

### ZeroEyes

On March 21, 2022 the District and ZeroEyes, a camera-based AI weapons detection technology, signed an agreement. OHS has deployed ZeroEyes as an additional layer of weapons detection technology. The system works by utilizing existing camera feeds and applying their AI learning technology to identify and alert on the presence of visual firearms. If an alert is generated, the ZeroEyes Operations Center reviews the alert to verify the presence of a weapon. If an alert is verified, the ZeroEyes Operations Center sends an alert to the designated and approved contacts and informs them of the verified threat. On March 3, 2022, ZeroEyes was granted SAFETY Act Designation by the Department of Homeland Security through February 28, 2025.<sup>227</sup>

The Security Specialist II, the SRO, and all administration receive alerts on their phones when ZeroEyes flags a weapon. To date, OHS has not experienced any false positive alerts. The reviewers for ZeroEyes are intended to be the first to call 9-1-1 when the system alerts.

The largest benefit of the ZeroEyes technology is that it can minimize the time between the start of an aggressor situation and the engagement by police/first responders. The sooner a potential aggressor situation is identified, and police summoned, the quicker an intervention to occur that could lower casualties.

**Guidepost Assessment:** Guidepost is aware of other educational institutions using ZeroEyes. Guidepost notes that ZeroEyes does not detect concealed weapons and is predominantly focused on the detection of visible firearms.

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<sup>226</sup> Guidepost understands that OCS is already aware of this fact.

<sup>227</sup> "DT&E Designations," SAFETY Act, U.S. Department of Homeland Security, 2023 (<https://www.safetyact.gov/help-doc/3558.htm>).

## Weapons Detection Canine

As of March 2022, the District began exploring the possibility of obtaining an ammunition dog or dogs, but the District needed to find a handler willing to release liability from the District. On October 10, 2022, OHS announced the arrival of a weapons detection canine, *Daisy*. The Security Specialist II is Daisy's handler; he trains, handles, and houses Daisy.

## Video Surveillance System

The Video Surveillance System ("VSS") at OHS is exacqVision by Tyco which is a Johnson Controls brand. This platform is used across OCS for all school properties. OHS houses a Security Office which has access to every camera within the OCS system.

The primary governance documents for the physical security technology onsite, specifically the video surveillance system include:

- Administrative Guideline 7440.01 VIDEO SURVEILLANCE AND ELECTRONIC MONITORING (Adopted Mar. 1, 2011, Revised Sep. 16, 2020)
- Policy 7440.01 VIDEO SURVEILLANCE AND ELECTRONIC MONITORING (Adopted June 8, 2021)
- Policy 7440 F1 VIDEO SURVEILLANCE RECORDING RELEASE FORM

Guidepost reviewed Policy 7440.01 VIDEO SURVEILLANCE AND ELECTRONIC MONITORING in the Policy Manual Section 7000 Property. This document was adopted on June 8, 2021. This policy states that information obtained through video surveillance or electronic monitoring may be used to identify intruders and persons breaking the law, Board policy, or the Student Code of Conduct. This document further states:

The Board recognizes that the use of a video surveillance/electronic monitoring system does not replace the need for the ongoing vigilance of the school staff assigned by the building principal to monitor and supervise the school building. Rather, the video surveillance/electronic monitoring system serves as an appropriate and useful tool with which to augment or support the in-person supervision provided by staff. The building principal is responsible for verifying that due diligence is observed in maintaining general campus security.<sup>228</sup>

Guidepost reviewed the document, 7440.01 VIDEO SURVEILLANCE AND ELECTRONIC MONITORING in the Administrative Guideline Manual Section 7000 Property adopted on March 1, 2011, and updated in September 2020. The guideline governs the implementation of video surveillance and electronic monitoring systems on school property and in school buildings and buses. The guideline also addresses staff members' use of portable video cameras on school property for security purposes. It should be noted that Board Policy 7440.01 and this guideline do not apply to the District or parent-created video recordings of school events.

The Director of Cybersecurity & Operational Technology is designated as the responsible party for the proper implementation and control of video surveillance or electronic monitoring system installed and operated in all buildings and premises. The Director is supposed to conduct a periodic audit of random images from the video surveillance or electronic monitoring system to verify that equipment is operating properly and has not been blocked, moved, or alerted and is still operating in compliance with the policy. The Director of

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<sup>228</sup> Policy 7440.01 VIDEO SURVEILLANCE AND ELECTRONIC MONITORING, Jun. 8, 2021.

Cybersecurity & Operational Technology is responsible for adhering to a strict maintenance program, including image refocusing and lens cleaning where surveillance and electronic monitoring equipment is installed.

Policy 7440.01 VIDEO SURVEILLANCE AND ELECTRONIC MONITORING requires the use of legible and visible signs placed at the main entrance to buildings and in areas where video surveillance/electronic monitoring equipment is in use. The policy subsection requires signs to be reasonably designed to notify people that their actions/behavior are being monitored/recorded.<sup>229</sup> Guidepost notes that the signage is present but recommends utilizing larger fonts and placing the signage closer to eye-level to ensure people approaching the entrance are aware of the security measures in place for awareness and deterrence.



Figure 20: Video Surveillance Signage

The Security Specialist II, the administrators, and SRO have access to the video surveillance system. Staff indicated how the camera placement is continually evolving to minimize blind spots. Staff further indicated that they still had not undergone any formal training in the video surveillance system.

**Guidepost Assessment:** Guidepost found that OHS has expansive video surveillance coverage on the interior and exterior and is using a reputable VSS with appropriate video camera technology and storage infrastructure and protocols. Guidepost noted that staff with access to the VSS and those responsible for leveraging it for work purposes have not received specific training in the technology. This training is highly important to ensuring that staff know the most effective and efficient ways to be able to operate the system under stress and have backup staff members who know how all the security systems work. The District added an additional server to provide more robust infrastructure for the addition of cameras at OHS. The VSS is not integrated with the access control system, and this integration could provide significant advantages to OHS.

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<sup>229</sup> *Id.*

## Intrusion Detection System

OHS utilizes an Intrusion Detection System (IDS) for afterhours monitoring. Intrusion detection systems come with a variety of sensor types that can detect an intrusion anomaly, such as door contacts, motion sensors, and glass break sensors. Some doors on the campus are also equipped with annunciators to alert when an exterior door is held open.

## Panic Buttons

OHS has panic buttons placed throughout the building with instructions to lift the cover, call 911 for violent threats, and push the button. These devices are no longer active or in use onsite; however, they are still installed throughout the building. These are SecureAlert devices and part of PrePlanLive's duress alarm system. Guidepost understands that PrePlanLive, a Michigan-based immersive technology company, installed the devices and previously provided alerting fobs. PrePlanLive is currently wholly owned by BELFOR and is "a BELFOR USA company" that produces and sells the BELFOR Alert line of products.<sup>230</sup>

**Guidepost Assessment:** Guidepost understands that PrePlanLive panic buttons are no longer actively used and do not automatically contact law enforcement. To avoid confusion in emergency situations, the PrePlanLive buttons should be removed from the walls. More in-depth review of PrePlanLive technology as well as its condition leading to and on the day of the shooting will be discussed in Report Two.

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<sup>230</sup> "About BELFOR ALERT," BELFOR ALERT, PREPLANLIVE INTERNATIONAL, LLC, 2023 (<https://www.belforalert.com/about/>).



**Figure 21: Wall-mounted Panic Button**

## Public Address (PA) System

Audio and visual notification systems play a critical role in any emergency response measures, but their performance is particularly important in events that require specific instructions to be given. The core emergency response protocol for active shooter situations at OHS, ALICE, is based on the need to Alert and Inform persons onsite. For an ALICE-based emergency response public address system to be effective, the system must be both audible and understandable, or it may lead people to take the wrong action or to not be informed to take any action at all.

OHS is in the process of activating a new mass notification system for emergency messaging. According to OCS staff, the activation of the new mass notification system has encountered delays due to the microchip shortage. In the meantime, OHS currently uses its public address system for both emergency and non-emergency messaging. Once the new mass notification system is installed, it will take over the emergency messaging, while the existing public address system will continue to be used only for non-emergency messaging.

Guidepost conducted a review of the current public address system. As a new mass notification system is being installed and not yet testable, Guidepost was not able to make any assessment of the new system beyond observing the locations of new annunciators associated with it.

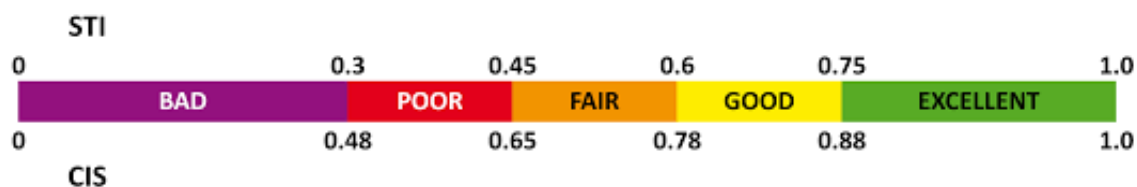
The current public address system is based on a hybrid IP/analog platform that supports IP call devices (phone systems) and system expansion, while the primary audio annunciation throughout the campus is made through a transformer-distributed system employing conventional analog amplifiers and loudspeakers. The current platform includes speakers that date back to the deployment of the original system likely installed in the former middle school, the predecessor of OHS.

User access to the PA system is through either the campus VoIP phone system (most common) or a desktop push-to-talk microphone. The speaker deployment consists of a range of different form factor types. Horns – mostly enclosed in tamper-resistant cages – are installed for all exterior locations. Round recessed speakers are bridge-mounted into drop ceiling tiles in areas with suspended acoustic ceilings. The same speakers are installed in boxes and mounted to the structure in open ceiling areas. Where ceiling speakers are not possible or preferred – the classrooms and some corridors with pitched ceilings – wall-mounted speakers are used, either recessed into the wall or mounted to extend off the wall and rotated horizontally to fire down the corridor.

The performance of the system at OHS varies considerably depending on the dimensions and acoustic properties of the space, the type, quantity, performance characteristics and positioning of the speakers, the level at which the PA system is set, and the ambient sound level (i.e., all other sound in the space that is not produced by the PA system).

The industry has developed a measurable technical standard for grading the intelligibility of a sound system within a particular space called “STIPA,” which stands for “Speech Transmission Index for Public Address.” Using a specialized signal generator (called a “talk box”) and a portable sound meter/acoustic analyzer, a STIPA rating can be determined for an “acoustically distinguishable space” (“ADS”). This is a space – enclosed or not – with acoustic properties different from the adjoining spaces.<sup>231</sup> A classroom is an example of a closed ADS. A corridor with no doors between two larger areas is an example an ADS that’s not physically enclosed.

Below depicts the STIPA scale:



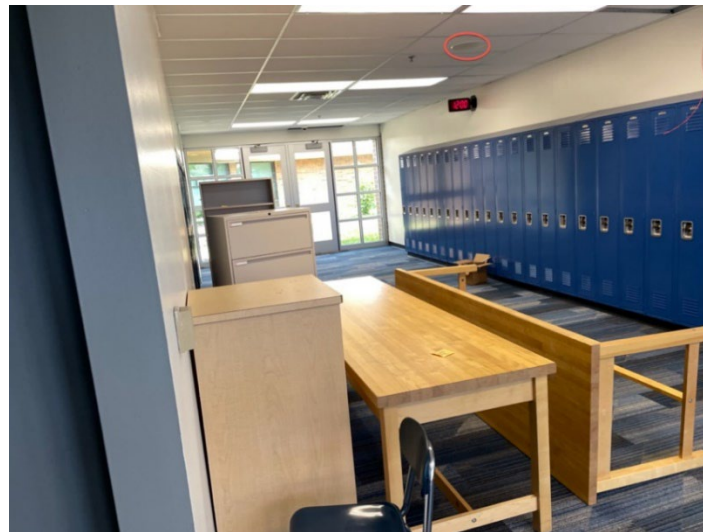
**Figure 22: Speech Transmission Index for Public Address**

A properly designed, conventional public address system is expected to fall between 0.45 and 0.6 on the STI (upper numbers) scale. The National Fire Protection Association’s (NFPA) National Fire Alarm and Signaling Code (NFPA 72) considers an emergency notification system acceptable if 90% of the measurement locations within each ADS meet a minimum of 0.45 (fair) with the ADS having an overall average measurement of 0.50. The scale assumes the message broadcast over the PA is in the same native language as the listener. If the listener’s native language is different, then the PA’s performance is likely to be subjectively worse.

<sup>231</sup> As defined under NFPA (“National Fire Protection Association”) 72, National Fire Alarm and Signaling Code.

Many of the OHS corridors and all the individual classrooms and offices would very likely meet the NFPA standard based on our survey measurements using the tools mentioned above. Corridors performing best – consistently above 0.5 – are those with lower acoustic suspended ceilings and recessed ceiling speakers, for the following reasons:

- 1) The speaker is closer to the listener, so the listener is primarily getting “direct” sound, i.e., sound emanating directly from the loudspeaker and not the product of a secondary reflection in the ADS. The shorter distance between the speaker and listener also means the system is better able to supply a sound volume loud enough to hear above the ambient sound level (measured PA level should be 10dB to 12dB over the measured ambient sound level during peak activity).
- 2) Speaker directivity. The speakers are directed downward towards listeners passing by and the height of the ceiling – 8’ to 9’ – and dispersion pattern of the speaker – less than 120 degrees – will mean the sound will have minimum interaction with the neighboring walls, reducing the quantity and intensity of secondary reflections.
- 3) The ceiling material is acoustically absorbent, which would limit early reflections of ambient sound (student voices) that would amplify it.



**Figure 23: Drop Ceiling with Recessed Speaker**

The classrooms and offices share similar advantages: the proximity of the speaker to most listeners. They both have low (classroom) to very low (office) ambient sound levels which are easily measured and generally consistent throughout the day, making the appropriate PA level easy to set. They are also populated with people and furnishings which act as sound absorption, reducing the potential for acoustic reverberation.

Corridors with a different ceiling structure or an elevated vertical dimension generally do not perform as well, each for different reasons. Where speakers are mounted in ceilings higher than 9’ – such as the corridor that passes in front of the administration office (100) – the volume is often too low to be heard (78dB) when the area is populated by more than a few students. In other corridors the finish materials and speaker types create reflections that muddy the message. The corridor running north-south in the 100 section measured 80dB – sufficient volume – but only 0.33 STI (poor) because of interaction between the wall mounted speakers and corridor surfaces.





Figure 24: Elevated Ceiling and Speaker in Main Entry Corridor

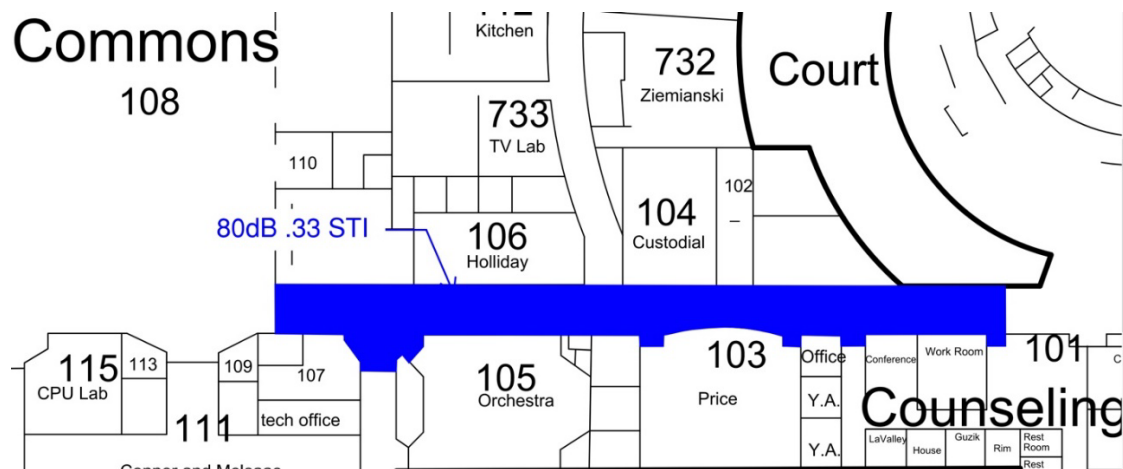


Figure 25: Poor Intelligibility Area

Large specialty spaces are particularly problematic.

The PA speakers in the two gyms are unintelligible even when the gym is empty. Gyms are notoriously difficult acoustical environments. They are highly reverberant because of the surfaces, i.e., wood floors, hard walls, and ceilings. Gyms are typically large rectangular boxes, making reverberation times long, resulting in near echoes that impede intelligibility. Populating the space with devices for use in a classroom or corridor, but just using a lot more of them, is rarely effective and can actually make matters worse. Adding the additional factor of a highly elevated ambient sound level comprised of people playing a sport, spectators, and a facility installed audio system that is much more elaborate and expensive than the PA devices used, the PA system cannot compete, much less be heard sufficiently above the ambient sound level unless it is designed specific to the environment.



**Figure 26: New Mass Notification Annunciators in Gym West**

The natatorium suffers from some of the same acoustic properties as the gyms, i.e., hard, reflective, flat surfaces, and speakers are not evenly distributed along the poolside. The space averages 72dB, which is probably 8-10dB low, but increasing the volume would also increase the level of reverberation already hampering intelligibility. Speakers would ideally be positioned evenly alongside the pool and aimed at the water, minimizing reflections off the other surfaces.

The auditorium also presents challenges, albeit different ones. The PA speakers installed in the auditorium are intelligible when there is no audience, but that is not the environment in which the system will be most valuable. During a production, the PA will be difficult to hear and understand when competing against the facility's program sound system. PA system speakers should also be installed in the sound booth so that the sound technician will hear the alert first and manually draw down the house sound system.

The two large interior courtyards each have two horns placed at long ends of an approximately 210-foot-long green belt which are aimed across the middle of the area. The result is while coverage across most of the courtyard is acceptable, there are prominent dead zones entering the building at the doors between 301 and 403, and 402 and 501 due to the shape of the space. The ceiling speakers in the short corridor leading to the south court are also not working as of April 25, 2023 which was the date of testing.



Figure 27: No-Coverage Zones



Figure 28: North Courtyard Horn

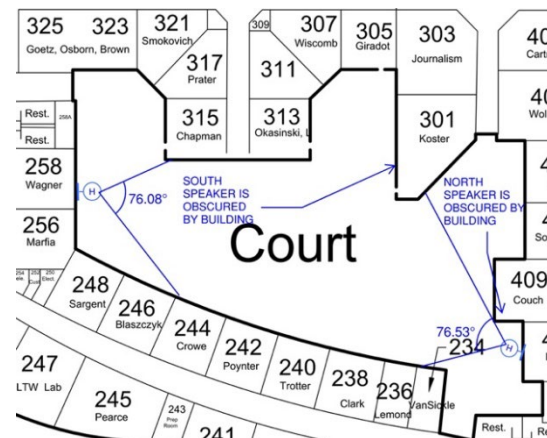


Figure 29: Obstructions

The Senior Court has one horn speaker deployed on one end. At 72dB in the center of the area, volume could be increased 6 to 8dB to improve audibility at the opposite side without risking reverberation. At 0.52, however, the average intelligibility is currently acceptable if the area is not heavily populated.

The horns mounted on the campus' exterior walls are typical for covering wide, flat areas like parking lots and walkways. The exterior areas surrounding the OHS campus are almost entirely a "direct field," which means the audio heard in these spaces is originating unobstructed directly from the speaker, and not the result of specular reflections as there are no structures within range. The extent of coverage can be determined by increasing or decreasing the volume of the speakers and/or re-aiming the speakers without concern about reverberation.

Neither the football stadium nor the tennis courts are currently part of the PA distribution system. At a distance of approximately 500 feet, the tennis courts are too far from the buildings on the north side to be reached by conventional PA horns. Either local speakers would need to be installed, or a specialty speaker

made by companies like Hyperspike installed on a building on the north edge to cover the courts from the main campus.

The football stadium would require a facility-specific solution that would provide coverage to most of the field for intramural activities while also serving the facility – almost certainly with operational coordination with the installed stadium public address system – during games.

**Guidepost Assessment:** OHS has made a concerted effort to update its emergency communications via the use of a mass notification system, but the system's activation has been significantly delayed. The public address system at OHS is effective at what it was designed to do: distribute general messages throughout the school day. It is not as effective at broadcasting emergency notifications that need to be clearly heard and understood whatever the environment for the audience. Until the new mass notification system is activated, OHS is using the public address system beyond its intended capabilities. Under ideal conditions, i.e., students in classes, corridors lightly populated, music system off, the commons area mostly empty, the PA system would function relatively well for about 70% of the campus during an emergency. Should any of those variables change the system would be significantly under-designed. Overall average volume across the campus, for example, is 10 to 12dB below where it would need to be to adequately cover heavily populated public areas like a corridor between classes.

Campus sound systems providing music or other programming should be automatically suspended when an emergency announcement is initiated, something that would be required by code for a true mass notification system but is not practical for a public address system broadcasting general, as well as emergency, content. Speakers should be placed in locations essential for many emergencies, such as entrances from the courtyards into the building, for example even if those speakers are unnecessary for general messaging.

## RISK PRIORITIZATION METHODOLOGY

Guidepost assigned a prioritization level to each observation based on the perceived level of risk that the observation commands in relation to safety and security measures at each location. This approach supports a phased review, corrective action schedule, and program that can be adopted by OCS to support and substantiate future fiscal budgeting for corrective action by prioritization and risk levels. In addition, our team made, and documented, observations and recommendations as applicable. Our team observed many positive existing safety and security practices and general behaviors.


The prioritization rankings assigned per observation are color-coded and identified in each school's observations and recommendations table. The allocation of a risk prioritization number reflects a ranking for corrective actions by individual school and collectively across Oxford's buildings. This will further support programming, scheduling, and funding corrective actions based on a point scoring system. Physical security assigned prioritization level and ranking score are as follows:

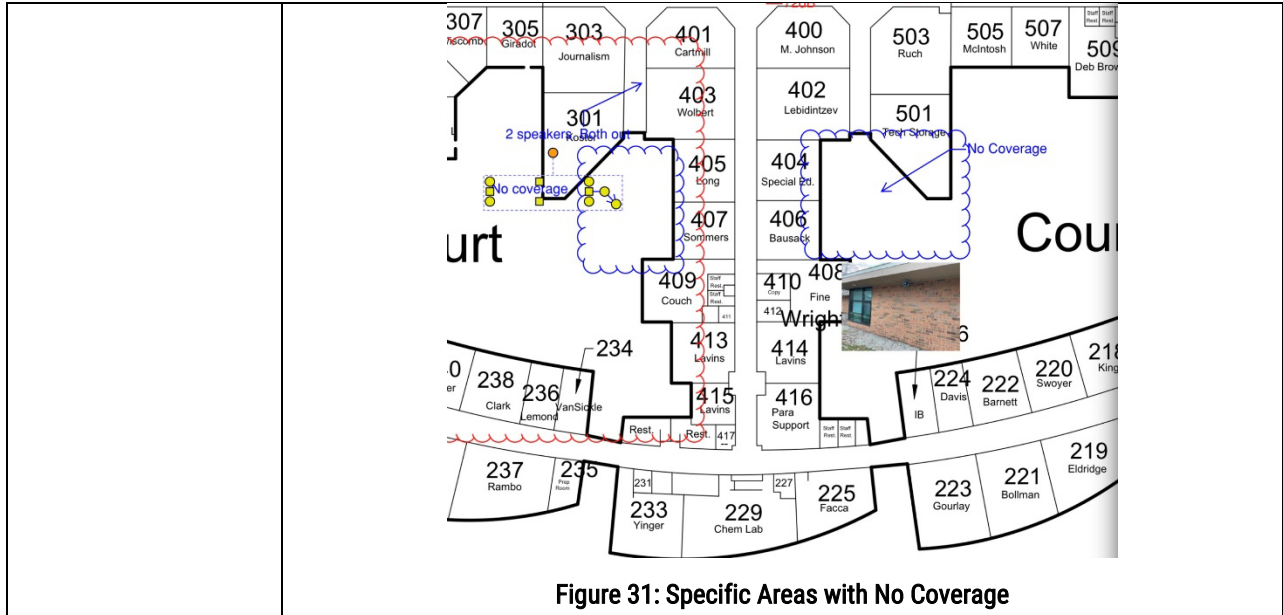
| Prioritization      | Ranking  | Description            | Explanation  |
|---------------------|----------|------------------------|--|
| <b>High</b>         | <b>5</b> | Emergency              | Safety of life or property is threatened, and immediate resolution is required. Funds need to be expended immediately to remediate these items.  |
| <b>Medium High</b>  | <b>4</b> | Urgent                 | Review existing safety and security policies, procedures, or physical components that present a high-level risk. Identify corrective measures and actions to mitigate risk level and reduce potential to breach security posture. Any available funds after emergency items are corrected should be used here. |
| <b>Moderate</b>     | <b>3</b> | High Moderate Priority | Provide corrective action to enhance existing safety and security measures. Alter, implement, and enforce policy changes to strengthen existing security posture. These items should be funded through a phased design and implementation plan.  |
| <b>Low Moderate</b> | <b>2</b> | Low Moderate Priority  | Perform maintenance and/or construction to correct issues and/or implement policies and procedures. These are items to enhance security that can be implemented as funding becomes available.  |

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| Low         | 1 | Low Priority        | Observations that would enhance and augment existing safety and security measures. These are improvements to existing system functionality and security measures in place. They are not critical to the overall safety and security of the facility. |
| Observation | 0 | General Observation | Review comment made for reference only.  |

Observation descriptions are varied based on the issue identified but are benchmarked for consistency and the need to action/correct using the previous observation risk prioritization table. Utilizing the prioritized number risk ranking points process will support Oxford in both identifying resource management allocation and fiscal budgetary planning to correct issues identified as presenting the highest risk to the overall school.

# PHYSICAL SECURITY OBSERVATIONS AND RECOMMENDATIONS

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| <p><b>Observation 1:<br/>Current Public Address System</b></p> | <p>Guidepost understands that the existing public address system is in the process of being replaced with a new mass notification system. A supply chain issue has delayed the activation and testing of the new system. The existing system is used for both routine and emergency communications and does not provide consistent coverage for the courtyard areas. Persons present in the courtyards may not hear emergency announcements clearly. Guidepost conducted an intelligibility review and identified no-coverage areas near two entry points in two courtyards. The first area is at the entrance between Room 301 and Room 403. The area does not have sufficient speaker coverage present for persons in the vicinity of the area across from Rooms 409, 407, and 405 to hear an intelligible announcement in this area. The second area is the entrance from the courtyard between Room 402 and Room 501. The area where coverage is lacking includes space across from Room 406, 404, and 501. Guidepost expressed concerns to OCS staff while onsite regarding the limited coverage.</p> |
| <p><b>Priority Ranking:</b></p>                                | <p><b>Medium High</b></p>  |
| <p><b>Recommendation:</b></p>                                  | <p>Guidepost recommends that, until the new mass notification is installed and tested, OHS limit access to the impacted courtyards described above. Guidepost notes that speakers are present in the impacted courtyards, but they are not sufficient to provide consistent levels of coverage.</p>  |
| <p><b>Additional Notes or Photos:</b></p>                      | <div style="text-align: center;">  <p><b>Figure 30: Courtyard Space Example</b></p> </div>   |



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| <p><b>Observation 2:</b><br/> <b>3 Classroom Locking Hardware</b></p> | <p>Guidepost noted that most classrooms could not be locked from the inside with awareness of the state of the lock (whether it was locked or unlocked). The presence of the Nightlock® devices is beneficial, but they should not be relied upon as the only measure to secure classroom doors.</p>  |
| <p><b>Priority Ranking:</b></p>                                       | <p><b>Medium High</b></p>   |
| <p><b>Recommendation:</b></p>   | <p>Ensure that all the classrooms, offices, locker rooms, and similar occupied spaces have classroom locking hardware that can be locked from the inside with an indicator showing locking status of the door (locked or unlocked) from the inside. These are called classroom locks. The Nightlock® devices, as approved by the AHJ, are a positive, additional, measure, but the goal is to ensure that the door can be locked without a third-party device and permit free egress. In the event that a Nightlock® is not present for some reason, another means is necessary to secure the doors. In addition, keep classrooms doors locked when occupied.</p> |



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| <b>Observation 3:<br/>Planned Mass<br/>Notification System</b> | <p>OHS is in the process of installing a mass notification system which the school intends to use for emergency notifications throughout the campus. The project has become delayed due to supply chain issues. For the new mass notification system, OHS has placed Edward Fire Alarm speakers with yellow strobes throughout the building and courtyard areas. While the placement of so many speakers is helpful to ensure persons onsite can hear the messages, the concern is that the placement and type of equipment used is not ideal with areas with high ambient sound levels, such as the PAC, gym, or cafeteria.</p> |
| <b>Priority Ranking:</b>                                       | <b>Medium High</b>   |
| <b>Recommendation:</b>   | <p>Once the mass notification system is active, Guidepost strongly recommends that the OCS have an audio expert conduct an assessment with the appropriate technical equipment to determine if the coverage is sufficient for the environmental environment. Key areas for testing include the gym, cafeteria, PAC, courtyards, and exterior areas. The assessment should produce quantitative results to determine the true conditions onsite. The conditions should be tested under normal and high activity conditions.</p>   |

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| <b>Observation 4: EOP</b> | <p>Guidepost was encouraged to see the OCS’s EOP development coming to completion. This is a requirement under Policy 8402 Emergency Operations Plan, which states:</p> <p style="padding-left: 40px;">By no later than January 1, 2020, for each school building the District shall 1) develop an emergency operations plan or 2) adapt its statewide school information policy (referred to as the “Plan” throughout the remainder of this Policy) to comply with the requirements of this Policy. This action shall be taken with input from the public. School building means any building intended to be used to provide instruction to students and any recreational or athletic structure or field intended to be used by students.<sup>232</sup></p> |
| <b>Priority Ranking:</b>  | <b>Medium High</b>   |
| <b>Recommendation:</b>    | <p>Guidepost recommends expediting the required vulnerability assessment and emergency plan development for the individual OCS buildings. Rather than merely leveraging the SEC report conducted one year prior, Guidepost recommends that the leadership at each school work with the District to conduct an updated vulnerability assessment. Guidepost notes that a lot of positive changes have taken place across the District since the initial report. These elements should be considered as the new emergency plans are developed for each school.</p>  |

<sup>232</sup> Board Policy po8402 EMERGENCY OPERATIONS PLAN, May 28, 2019.

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|  | Once the school emergency plans are finalized, Guidepost recommends that OCS ensure that the posted emergency flipbooks onsite are replaced to avoid confusion. |
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| <b>Observation 5:<br/>Emergency Drills</b> | Policy 8402 Emergency Situations at Schools states that the Principal shall post documentation of a completed school safety drill on the school’s website within 30 school days after the drill is completed and that this information is maintained on the website for at least three years. <sup>233</sup> Guidepost notes that OHS posted school safety drills from March 7, 2019, to November 11, 2021, but no drills were posted beyond this timeframe. <sup>234</sup> |
| <b>Priority Ranking:</b>                   | <b>Medium High</b>  |
| <b>Recommendation:</b>                     | Guidepost recommends that OHS commit to completing the required drills for the 2023-2024 school year. Special measures will be needed to aid students who might have a negative reaction. Staff indicated that students had not been in the position to conduct drills due to trauma experienced from the events of Nov. 30, 2021. The assessment team recommends small steps to prepare students, staff, and faculty to engage in drills.                                  |

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| <b>Observation 6:<br/>Substitute Teachers<br/>and Part-time Staff</b> | Guidepost understands that substitute teachers and part-time staff at OCS are currently not provided consistent ALICE training or guidance on how to secure classrooms. Substitute and part-time staff should also be trained in what to do in the event of natural or hybrid hazards as well. The training should also include how to notify the office via the emergency line in the event of an emergency.  |
| <b>Priority Ranking:</b>  | <b>Medium High</b>   |
| <b>Recommendation:</b>  | Provide ALICE training and hands-on instruction in how to secure classrooms with locking hardware and the Nightlock® devices to all substitute teachers, volunteers, coaches, and part-time staff at OCS. Provide a highly visible emergency poster or signage in all classrooms and offices to alert contractors, substitute teachers, coaches, part-time staff, and others who may not regularly be on OCS properties to the emergency protocols.<br><br>The intent is not necessarily to provide extensive guidance but to help those present understand how to lockdown space, operate the locking hardware, install and disengage a Nightlock® device, and know what to do in the event of an emergency alert. The signage should include how to notify the office via the phone present in the |

<sup>233</sup> Board Policy po8402 EMERGENCY OPERATIONS PLAN, May 28, 2019.

<sup>234</sup> “School Safety Drills,” Oxford High School, 2023

([https://oxfordhigh.oxfordschools.org/administration/school\\_safety\\_drills](https://oxfordhigh.oxfordschools.org/administration/school_safety_drills)).


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|  | <p>event of an emergency. The signage should provide step-by-step instructions for engaging the Nightlock® device. In addition, all substitute and part-time staff should be provided with training on identifying students exhibiting threatening behavior or suicidal ideation with specific guidance on how to notify counsellors and obtain immediate help for the student.</p> |
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| <p><b>Observation 7:<br/>Search and Seizure</b></p> | <p>Staff are currently not required to go through Evolv screening. Guidepost understands that the District is coordinating with the union to determine whether this can be required.</p> <p>The search and seizure guidance is also in need of updates to reflect the new technologies in use onsite. Guidepost notes that OCS is preparing a policy on Evolv screening, which will be a good supplement to the search and seizure guidance.</p> |
| <p><b>Priority Ranking:</b></p>                     | <p><b>Medium High</b></p>  |
| <p><b>Recommendation:</b></p>                       | <p>Guidepost strongly recommends that all staff (including faculty), vendors, contractors, visitors, and others onsite go through Evolv with no exceptions.</p>  |

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| <p><b>Observation 8: After Hours Screening</b></p> | <p>The weapons screening procedures and identification checks for visitors and students afterhours are inconsistent with the school day operations. Access and activities are not as closely monitored afterhours. The concern is that after school events could be targeted or used to bring in contraband for a later date or time specifically for the reason that screening is inconsistent. Guidepost understands that approximately 40% of the student population, including the virtual academy, participates in athletics.<sup>235</sup> At least 800 students participate in at least one sport.<sup>236</sup> The high school has 20+ active sports for student participation.</p> |
| <p><b>Priority Ranking:</b></p>                    | <p><b>Medium High</b></p>  |
| <p><b>Recommendation:</b></p>                      | <p>Guidepost recommends that screening and registration procedures be used at any time that people are entering the school premises. This ensures ongoing safety measures at all times. This would ensure that all individuals entering are still vetted, approved, and logged regardless of what time they are visiting the school. In addition, it would reduce the likelihood of an individual circumventing security processes for nefarious reasons, such as material staging to be used at a different time.</p>   |

<sup>235</sup> Interview with Tony Demare

<sup>236</sup> *Id.*

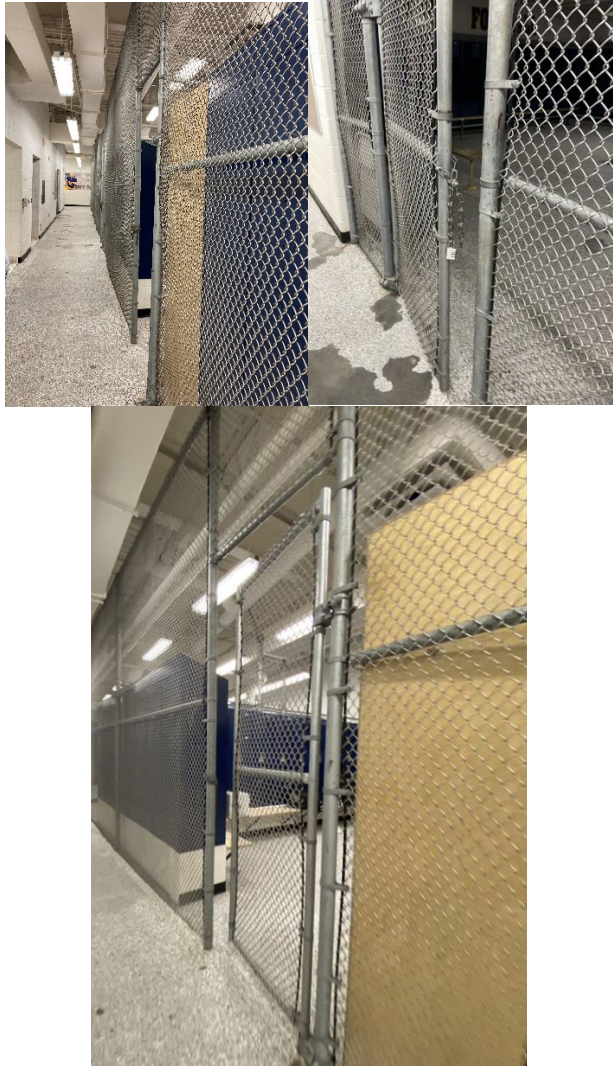
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| <p><b>Additional Notes or Photos:</b></p> |  <p style="text-align: center;"><b>Figure 32: Screening Equipment at Night</b></p> |
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| <p><b>Observation 9:<br/>Exterior Glass</b></p> | <p>The assessment team noted that OHS had invested in 3M™ film to limit visibility in OHS student and staff areas. The challenge is that the 3M™ film does not provide rated ballistic resistance. Other options are available that provide a level of bullet resistance. Guidepost understands that the administration has attended a demonstration on a more robust option. Given the significant glass at the entrances to OHS, this represents a vulnerability.</p>  |
| <p><b>Priority Ranking:</b></p>                 | <p><b>Medium High</b></p>  |
| <p><b>Recommendation:</b></p>                   | <p>Guidepost recommends that OHS implement a laminate with bullet resistance materials for the main entry points and the sidelites and glass panels in or near classroom and office doors. The assessment team recommends that OCS work with the AHJ to confirm alignment with fire and life safety requirements prior to implementation. Guidepost is aware of options that are rated at a UL Level 7 and NIJ Level 3. Guidepost notes that even bullet-resistant laminate, glass will eventually break, but the laminate helps to limit glass projectiles and keep the glass intact. The goals for security measures vary from deterrence, detection, and delay. This measure seeks to provide a delay to allow occupants to engage emergency procedures and provide first responders with more time to arrive onsite.</p> |

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| <p><b>Observation 10:<br/>Panic Buttons</b></p> | <p>PrePlanLive panic buttons are placed throughout the OHS building. These devices are no longer used, but they are still present. The devices are labeled with instructions to contact 9-1-1, but their presence raises potential confusion especially for persons unfamiliar with the building.</p> |
| <p><b>Priority Ranking:</b></p>                 | <p><b>Medium High</b></p>   |
| <p><b>Recommendation:</b></p>                   | <p>Guidepost recommends OCS expedite the removal of any non-functional PrePlanLive panic buttons and any other non-functional duress buttons onsite to avoid confusion in the event of an emergency.</p>  |

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| <b>Observation 11:<br/>Reunification</b> | <p>Guidepost notes that the new EOP includes guidance regarding the reunification process and offsite reunification locations. Reunification is the process by which students are connected with their approved parent or guardian following an emergency situation. For large scale emergencies, reunification can occur at offsite locations. Reunification is a critical aspect of crisis response and requires clear guidance and testing. Guidepost understands that OCS is transitioning to using the Standard Response Protocol™ through the I Love You Guys Foundation. Through interviews, Guidepost identified a need to provide clear guidance, tools, and practice on the reunification process.</p> |
| <b>Priority Ranking:</b>                 | <b>Medium High</b>   |
| <b>Recommendation:</b>                   | <p>Given the use of the Standard Response Protocol™, Guidepost recommends that OHS leverage the Standard Reunification Method™ through the I Love U Guys Foundation. Guidepost recommends that OHS engage in training and drills to ensure that students and staff know how to respond appropriately, and parents understand the process to connect with their student(s).</p>   |

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| <b>Observation 12:<br/>Locker Room Fence</b> | <p>The assessors observed fencing with gates and chains that could be used to trap someone in a space in the locker rooms. Guidepost was concerned about the potential for this space to be misused both from an active assault perspective but also for bullying or hazing activities. Guidepost notes that those interviewed did not reference past issues of this occurring. In the assessment team’s opinion, the space has inherent fire and life safety concerns because it could prevent free egress if someone used the chain present and padlock to lock people into this space.</p> <p>The fencing also provides a climbing point to the above head infrastructure. The ductwork in particular could be used for staging or concealment within the locker rooms for later use. In addition, having a way of accessing the overhead infrastructure could allow for sabotage of school equipment.</p> |
| <b>Priority Ranking:</b>                     | <b>Moderate</b>   |
| <b>Recommendation:</b>                       | <p>Guidepost understands that the intent for the fencing is to limit opportunities for theft, but the concerns for people outweigh this measure. Remove the fencing area or add measures to ensure that individuals cannot be trapped in this space. At a minimum remove the gates present. Removing the chains and padlocks alone is not sufficient.</p>   |

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| <p><b>Additional Notes or Photos:</b></p> |  <p style="text-align: center;"><b>Figure 33: Locker Room Fencing</b></p> |
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| <p><b>Observation 13:<br/>Sentiment on Safety and Security</b></p> | <p>Guidepost noted that as of the spring 2022 survey, a significant percentage of students and parents raised concerns about feeling unsafe at OHS. Guidepost notes the improvements that OHS has made or is in the process of making to enhance safety and security conditions. The assessment team also notes the presence of new staff members tasked with safety and security. Despite this work, some in the community still have continued concerns about the state of safety and security.</p> |
| <p><b>Priority Ranking:</b></p>                                    | <p><b>Moderate</b></p>  |
| <p><b>Recommendation:</b></p>                                      | <p>Guidepost strongly recommends that OCS and OHS continue to engage in surveys to understand how students, families, and staff feel about safety and security on campus. As additional security measures, Evolv and ZeroEyes, will have been in place for a full school year by the close of the year, obtaining the thoughts of people who</p>  |

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|  | <p>come onsite daily can help to make adjustments, address gaps identified, and conduct more outreach.</p> <p>Guidepost often conducts stakeholder interviews and engages in online security perception surveys to help school districts and schools understand specific concerns, identify areas for potential improvement, and gain valuable insights from the community. Guidepost recommends that OCS and OHS have a third-party engage in an online survey and stakeholder interviews specifically on safety and security.</p> <p>While Guidepost has reached out to members of the community to obtain their thoughts and opinions, the need for broader engagement is clear. Guidepost notes that our team is still available to meet with stakeholders to discuss their concerns about physical security.</p> |
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| <p><b>Observation 14:</b><br/> <b>School Gate Guardian and School Roll Call</b></p> | <p>The School Gate Guardian ID scanning equipment is not completely accurate in capturing and displaying identification data. One assessor’s ID would not allow for a photo to be pulled, and the other assessor’s name information would not pull correctly even after multiple attempts. The result was that the assessor’s last name was wrong on the visitor badge. The team also noted that the photo captured was highly blurry and would likely present a challenge to use for identification purposes.</p> <p>The badges also do not display a visible marking that self-expires after a 24-hour time period, which could allow a badge to be used again for more than one day unless closely inspected to see the date on the badge. This functionality is offered in the School Gate Guardian system. Guidepost also noted the need for formal, documented protocols on how to handle alerts generated from the School Gate Guardian and School Roll Call.</p> |
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| <p><b>Priority Ranking:</b></p> | <p><b>Moderate</b></p> |
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| <p><b>Recommendation:</b></p> | <p>Work with the provider to ensure the School Gate Guardian software is up to date and working as intended. Ensure that the School Gate Guardian equipment in use is the latest model and/or replaced to ensure that normal wear and tear is not creating the issue.</p> <p>Ensure the optical character recognition device/scanner is set to the highest scanning resolution/dots per square inch to ensure pixilation issues can be minimized. Engage the School Gate Guardian account management on a regular basis to ensure known issues, software updates, or general user knowledge are continually being accounted. The system should be tested on a regular basis.</p> <p>Security staff should be trained and instructed to verify the information that was pulled from the scan with the government issued ID and modify any of the fields necessary that are not properly matching the ID to ensure the visitor is being properly compared against the databases and lists tied to the visitor management system.</p> |
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|  | <p>The best approach is to take a current photo of the visitor rather than to attempt to collect the image from the ID.</p> <p>Consider utilizing specialty printer paper that self-expires with “red lines or strike outs” after being exposed to oxygen for 24 hours. Alternatively, stickers exist that will change color after a period of time to indicate the badge is no longer active. This provides security and staff with the ability to identify if a visitor’s badge has expired quickly without having to investigate the date written on the visitor badge.</p> <p>Develop formal, documented protocols for how to handle alerts generated from School Gate Guardian and School Roll Call.</p> |
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| <p><b>Observation 15:<br/>Guard Post</b></p> | <p>When conducting the nighttime assessment, the assessment team observed that the main entrance security post was unattended for a period of time even though the door was unlocked due to afterhours activities. Security staff onsite after school hours do not consistently staff this entry point. Guidepost notes that this occurred with the prior security firm.</p>  |
| <p><b>Priority Ranking:</b></p>              | <p><b>Moderate</b></p>  |
| <p><b>Recommendation:</b></p>                | <p>Guidepost recommends that security staff provide consistent coverage for the main entry point and other areas where people will be entering the building for special events. This will reduce the possibility of individuals entering the property without being observed and vetted. The security staff should establish a relief protocol to ensure these posts remain staffed at all times. Given the level of activity onsite, having additional officer coverage to accommodate officer breaks and response needs for occupants, even though this arrangement may go beyond some schools might have in place.</p> |

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| <p><b>Observation 16:<br/>Contract Security<br/>Staff Selection</b></p> | <p>Guidepost understands that the selection of armed security contract staff is challenging. OCS recently selected another firm that better aligns with its expectations.</p>  |
| <p><b>Priority Ranking:</b></p>   | <p><b>Moderate</b></p>   |
| <p><b>Recommendation:</b></p>   | <p>Guidepost recommends that OCS establish key performance indicators and metrics to evaluate the performance of contract security staff. When seeking to include private security officers onsite, consider the ASIS International <i>Private Security Officer Selection and Training Guideline (ASIS PSO-2019)</i>. The guideline provides a basis for an organization to develop its private security officer selection and training policies, practices, procedures, and program and/or demonstrate that they are consistent with applicable legal, regulatory, and contractual obligations in the</p> |



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|  | jurisdiction where the organization is domiciled and where the security services will be performed. <sup>237</sup> |
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| <b>Observation 17:<br/>Guard Post Orders</b> | Staff onsite stated that duress alarm card readers have been ordered, but due to supply chain issues, they are still not installed. Interviewees noted that a mobile application can also be used to signal for an emergency situation in addition to the duress card reader stations that will be installed in the near future. |
| <b>Priority Ranking:</b>                     | <b>Moderate</b>  |
| <b>Recommendation:</b>                       | Continue active tracking of the card reader order status, so that timely installation and training on system can take place for staff and students. It is necessary to confirm the protocols for what happens when a duress alarm is activated for all security staff, SRO, school administration, and staff.                    |



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| <b>Observation 18:<br/>Security Specialist II</b> | <p>While this Security Specialist II position is specifically tasked with being armed and prepared to respond to an immediate threat to protect students and staff, the responsibilities listed in the position description do not discuss maintaining weapons training, ensuring weapons safety, or verifying compliance with local, state, and federal firearms requirements and regulations. Such responsibilities should be clearly defined in the role description.</p> <p>Guidepost also observed that while the District has a job description for a staff member to be armed and prepared to respond to an emergency, it does not have a Use of Force Policy specifically for District staff that addresses expectations for firearms onsite. The District has Administrative Guideline 5630B – Use of Physical Force (Adopted Mar. 1, 2011). This document states that District personnel may use reasonable physical force upon a student necessary to maintain a safe learning environment and to protect staff member’s personal safety, safety of other staff members or visitors, safety of student or other students, school property from damage of destruction, and themselves and others from danger arising from a dangerous weapon or object which is in the possession of or control of a student. More clarity is needed to address the potential use of a firearm by a staff member.</p> |
| <b>Priority Ranking:</b>                          | <b>Moderate</b>   |
| <b>Recommendation:</b>                            | Guidepost recommends that the position description for the Security Specialist II be updated to reflect the weapons maintenance and training requirements. Guidepost notes that both the Security Specialist II and the School Safety Administrators joined   |


<sup>237</sup> *Private Security Officer Selection and Training Guideline*, ASIS PSO-2019, ASIS International, Inc., 2019 (<https://www.asisonline.org/publications--resources/standards--guidelines/ps0/executive-summary/>).

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|  | Fortis Group in weapons training. The policy and administrative guidelines need to address use of force for District staff. |
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| <b>Observation 19: Bus Surveillance</b> | The OHS transportation plan includes a fleet of 47 Oxford-operated school buses. Staff noted that surveillance cameras are deployed on the buses with an SD card-based format making video accessibility very slow and difficult. Staff stated that approval had been granted to upgrade the video surveillance system for the buses and would be undertaken by the school's security integrator. |
| <b>Priority Ranking:</b>                | <b>Moderate</b>   |
| <b>Recommendation:</b>                  | Ensure that the integrator installs the approved camera solution onboard the bus fleet so that video can be accessed readily.   |

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| <b>Observation 20: Courtyard</b> | A prior incident of vandalism revealed how easy it was for someone to scale the building to access the courtyard. This is due to the one-story layout around the school building and lack of perimeter fencing. While the preference would be to prevent students or anyone from accessing the courtyard afterhours by scaling the building, this might not be completely practical. In addition, adding motion sensors to this area may not be feasibly due to the outside environment. Nuisance alarms are likely. The concern is not only a potential breach onsite but more so that a student may become injured engaging in a dangerous activity and not found until the next day. If someone were to fall off the roof and become unconscious or unresponsive afterhours, particularly on a cold winter's night, this could be a life-threatening situation. |
| <b>Priority Ranking:</b>         | <b>Moderate</b>  |
| <b>Recommendation:</b>           | Guidepost recommends consideration for a system leveraging LiDAR sensing technology to provide accurate detection of intruders and moving objects. The sensors are not impacted by variable lighting, temperature, or environmental changes. The specialized laser detectors essentially place a virtual screen over an area. These situations are often used for rooftop areas, building exteriors, and fencing to detect intruders. Cameras will work as long as infrared light either in the camera or separately is present. Another option is to use video analytics to provide alerts when the areas are accessed after hours.   |

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| <p><b>Observation 21:<br/>Vehicle Deterrence</b></p> | <p>Limited vehicular deterrence measures are in place. These conditions allow for vehicles to drive directly up to the building façade. It could also allow the possibility for nefarious actors to cause property or bodily injury using a vehicle as an attack method. The main entrances are of particular concern as people can be waiting outside to go through Evolv screening at the start of the school day.</p> |
| <p><b>Priority Ranking:</b></p>                      | <p><b>Moderate</b></p>   |
| <p><b>Recommendation:</b></p>                        | <p>Investigate the possibility of installing vehicular deterrence measures in key locations on campus, such as the main entrances (Doors 1, 2, and 17). This would reduce the possibility of vehicular penetration into main areas of ingress and egress which are actively used and populated. A perimeter study provides specific guidance on the types of rated bollards needed for these spaces.</p>                 |
| <p><b>Additional Notes or Photos:</b></p>            | <div style="text-align: center;">  <p><b>Figure 34: Door 1 &amp; 54</b></p>  <p><b>Figure 35: Door 17</b></p> </div>  |

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| <b>Observation 22:<br/>Shade Policy</b> | <p>OHS does not have an official sidelite or door lite shade policy implemented. Guidepost observed Nightlock® shades in some areas, but the application was not consistent.</p>  |
| <b>Priority Ranking:</b>                | <p><b>Moderate</b></p>  |
| <b>Recommendation:</b>                  | <p>Implement and enforce a shade policy at all times which outlines if shades are allowed or not, when shades can be used if allowed, and consequences for not following the policy.</p> <p>Considerations for if shades are allowed and implemented:</p> <ul style="list-style-type: none"> <li>- Shades should allow for quick closing in the event of an emergency with operating controls that do not create tripping or strangulation hazards.</li> <li>- Create and strictly enforce a policy that requires all sidelites and door lights to be unobstructed and allow visibility into the classroom.</li> <li>- Any sidelite or glass door panel observed to be obstructed during normal operations should be immediately investigated and reported to school administration.</li> </ul> <p>Window shades can provide an additional layer of security in the event of an emergency but can also be abused allowing for the possibility of nefarious acts, such as child abuse/sexual assault. This makes it crucial to implement strict and enforced rules at all times.</p> |
| <b>Additional Notes or Photos:</b>      | <div style="text-align: center;">  </div> <p style="text-align: center;"><b>Figure 36: Sidelite Window Cover</b></p>  |

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| <b>Observation 23:<br/>Badge Policy</b> | <p>Staff are not all abiding by the ID badge display requirement established in Policy Manual Section 7000 Property, "Building Security and Key Control" which states, "All Oxford staff and visitors are expected to wear their assigned badges and it is each staff member's responsibility to maintain access to his/her designated building(s)."<sup>238</sup></p>                             |
| <b>Priority Ranking:</b>                | <p><b>Moderate</b></p>   |
| <b>Recommendation:</b>                  | <p>Enforce the ID badge display policy for staff and contractors. This helps with easy identification of school staff members by visitors and students. It also helps reduce the possibility that former or banned staff members can gain access to the site, as well as reduces the possibility of individuals impersonating a staff member to gain access to areas or sensitive information.</p> |

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| <b>Observation 24 Door<br/>Contacts</b> | <p>Not all exterior doors currently have door contacts / alarm monitoring points. Alerts have been applied to allow staff to know when a door has been propped open. These alerts have not been applied to all exterior doors.</p>   |
| <b>Priority Ranking:</b>                | <p><b>Moderate</b></p>   |
| <b>Recommendation:</b>                  | <p>Have the security integrator provide a proposal to install door contacts on all exterior doors that lead into the school. Apply the door contact consistently and ensure they are connected to the electronic access control system. Test the doors regularly to ensure alerts are generated appropriately.</p> |

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| <b>Observation 25<br/>Video and Access<br/>Control Software</b> | <p>At the time of the assessment, the Video Management (ExacqVision) and Access Control (S2 Netbox) systems were running earlier versions of the software. In addition, the access control system was not fully integrated with Active Directory.</p>   |
| <b>Priority Ranking:</b>  | <p><b>Moderate</b></p>  |
| <b>Recommendation:</b>  | <p>Engage the security integrator to confirm the most recent version of the software is in use, installed, and programmed appropriately. Keeping up to date on the most recent software for security technology ensures that any security patches, bug fixes, operational changes, and functionality of the system are applied and maintained. It is critical for the integrator to confirm the most recent version when completing this task as it could change again between the time this report is written and the correction is applied.</p> |

<sup>238</sup> Board Policy po7440 BUILDING SECURITY AND KEY CONTROL, Dec. 8, 2020.


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|  | <p>Further, an integration with Active Directory and the access control system would help minimize the potential for human error in the removal of access rights in the system upon termination or departure from the school. Since all employees are also enrolled into Active Directory, this can ensure that if rights are removed from Active Directory, it will automatically terminate access rights on their badge as well and can be further verified manually.</p> <p>In addition, the VSS and ACS should be fully integrated to allow for auto-alarm tagging and assistance with automatic call-ups in the VSS for alerts on the ACS.</p> |
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| <b>Observation 26:<br/>Viewing Monitors</b> | <p>The Principal's Assistant receives door open alarms for doors that are monitored via the electronic access control system via an email-based alert; however, this role does not have camera viewing capabilities for verification and follow-up. The site visit revealed that a viewing monitor is currently approved and will be installed in the near future.</p> |
| <b>Priority Ranking:</b>                    | <b>Moderate</b>  |
| <b>Recommendation:</b>                      | <p>Continue to track and ensure that the viewing monitor is installed for awareness, verification, and follow-up capabilities when a door alert is received by the Principal's Secretary. Ensure that a backup and tertiary staff member receives alerts in the event that the Secretary does not see the alert or is offsite.</p>                                     |

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| <b>Observation 27: SRO Reporting Structure</b> | <p>The SRO role is considered a resource for the School District Administrators and Principals, but the SRO is an employee of the OCSD, not the District. When the SRO is on District property, the SRO reports to the District's Building Principal and the Assistant Superintendent of Human Resources in that order, but the SRO is only disciplined by the OCSD.</p> |
| <b>Priority Ranking:</b>                       | <b>Low Moderate</b>  |
| <b>Recommendation:</b>                         | <p>Guidepost recommends that the SRO report to both the school principal and the Executive Director of Student Operations, rather than the Assistant Superintendent of Human Resources.</p>  |

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| <b>Observation 28:<br/>Weapons Detection Canine</b> | <p>Guidepost learned that having the weapons detection canine onsite continually can be challenging due to the physical limitations onsite.</p> |
| <b>Priority Ranking:</b>                            | <b>Low Moderate</b>   |

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| <b>Recommendation:</b> | Guidepost recommends consideration for additional options to allow Daisy to remain at school consistently during the school day to avoid a scenario where a staff member must leave campus to collect her. |
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| <b>Observation 29:<br/>Folding Knife</b> | A folding knife was left unattended by the prior contract security staff.  |
| <b>Priority Ranking:</b>                 | <b>Low Moderate</b>  |
| <b>Recommendation:</b>                   | Ensure that all staff know that potentially dangerous items should not be brought onto the premises. This can be done through refresher training orientation for new staff members. If designated staff are approved to carry firearms onsite, this does not include permission for other weapons to be brought onsite. If the items are authorized and necessary for work, a strictly enforced policy should be in place to ensure that items are not left unattended at any time unless properly secured. Security staff should continue to go through Evolv screening upon arrival. Everyone should go through screening. |
| <b>Additional Notes or Photos:</b>       |  <p style="text-align: center;"><b>Figure 37: Folding Knife</b></p>   |

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| <b>Observation 30:<br/>Rolling Gate</b> | A metal rolling gate was staged near Door 17 during a site visit. Though the gate is used daily for locking down that entry/exit area afterhours, it could potentially impede egress in the event of an emergency during hours of occupancy. Guidepost understands that OCS is in the process of adding more hall blockades to prevent access to the entire building. <sup>239</sup> Guidepost also encountered a blocked egress door in the PAC's prop and costume storage area. |
| <b>Priority Ranking:</b>                | <b>Low Moderate</b>   |

<sup>239</sup> Jim Rourke Interview 1.4.23

**Recommendation:** Keep the gate in secure storage or locked in place when not in use to reduce the possibility of the gate being deployed for nefarious reasons. Ensure that all egress points are properly cleared at all times. Remind students and staff of the importance of keeping these egress points clear of obstructions. Guidepost also recommends that OHS verify that doors that have been padlocked on the exterior are not in paths of egress. Door audits should be conducted at least twice a year or as required by the AHJ to ensure that points of egress are not blocked.

**Additional Notes or Photos:**



**Figure 38: Rolling Gate**



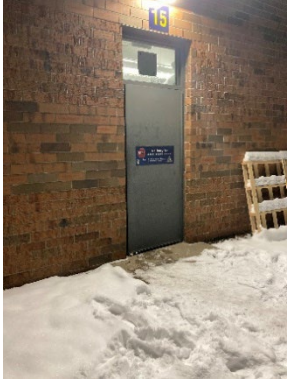
**Figure 39: Door 20 with Padlock on Exterior**

**Observation 31: Propped Door** Assessors observed a staff member prop a door open during the night assessment to allow easier access for bringing materials in and out of the building. Between trips the door was left unattended and unwatched. Guidepost understands that it is common for persons onsite to prop doors afterhours and during events. Guidepost notes that during the school day, this happens infrequently, and that security staff are monitoring this onsite.

**Priority Ranking:** **Low Moderate**


**Recommendation:** Remind all staff, contractors, students, and parents of the importance of maintaining a secure environment. If a door is required to be propped for ease of access, a



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|                                    | secondary person should be engaged to aid in the process and watch the door at all times to ensure unauthorized access does not occur.                |
| <b>Additional Notes or Photos:</b> |  <p data-bbox="836 693 1088 724"><b>Figure 40: Door Propped</b></p> |

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| <b>Observation 32: Bag Policy</b> | While onsite, Guidepost observed some students using opaque backpacks. The current requirement is that students only use clear backpacks during the school day. The assessors were aware that opaque sports backpacks can be brought inside afterhours but noted seeing opaque backpacks onsite during school hours. |
| <b>Priority Ranking:</b>          | <b>Low Moderate</b>  |
| <b>Recommendation:</b>            | Guidepost recommends that OHS continue to mandate and enforce clear backpacks, limit large opaque bags, and ensure that all bags are screened.   |

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| <b>Observation 33: Documented Video Surveillance Technology Standards and Legacy Technology</b> | Guidepost notes that the District reported that the site has no analog cameras. While onsite, Guidepost observed analog cameras, but the assessment team believes that these were legacy devices based on their placement. The new camera technology in place also shows that the District has invested significant resources in video surveillance cameras and the supporting infrastructure. It would be preferable to have a true architectural floor plan with details on the specific cameras used throughout.   |
| <b>Priority Ranking:</b>  | <b>Low Moderate</b>   |
| <b>Recommendation:</b>  | Older legacy cameras are present onsite. If the legacy devices are no longer being used and will not be replaced, remove existing unused devices, and patch the holes to avoid the appearance of active equipment and reduce the possibility of maintenance issues or confusion due to existing devices and cabling being in place.<br><br>When budgeting for future camera upgrades, all cameras should be upgraded at the same time to avoid creating a system with differing technology, image quality, maintenance needs, and device or manufacturer types. Alternatively, a repair and replacement schedule should be established to replace cameras on a rotational basis |

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|   | <p>every seven to ten years depending on their location and exposure to weather elements. The addition of any new cameras may also necessitate the need for additional storage to ensure optimum system response time and resolution.</p> |
| <p><b>Additional Notes or Photos:</b></p> | <div style="text-align: center;">  <p><b>Figure 41: Pelco and Axis Housings</b></p> </div>  |

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| <p><b>Observation 34:<br/>Technology Standards</b></p> | <p>Guidepost noted that the District previously received a quote from the security integrator to install Hikvision thermal cameras onsite with a Hikvision NVR.<sup>240</sup> This technology presents significant cybersecurity and foreign influence concerns. In August of 2018, the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (NDAA) was signed into law and banned the procurement or use of specifically named video surveillance camera and systems vendors, as well as specifically named suppliers of components in some video surveillance products, which are or could be used in U.S. Government-related video surveillance system deployments. The manufacturers named – including Hytera Communications Corporation, Dahua Technology Company, and Hangzhou Hikvision Digital Technology Company (and any subsidiary or affiliate of these companies) – were banned from use in U.S. government-funded contracts and in any ‘critical infrastructure’ and ‘national security’ usage. While the law does not prohibit the use of this technology in U.S. schools, the government recommends not using the technology due to foreign influence and cybersecurity concerns.</p> |
| <p><b>Priority Ranking:</b></p>                        | <p><b>Low Moderate</b></p>  |
| <p><b>Recommendation:</b></p>                          | <p>Given the U.S. government’s concerns regarding this technology, Guidepost recommends that OCS not permit the use of Hikvision or Dahua security surveillance cameras or other technology products onsite.</p>  |

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| <p><b>Observation 35:<br/>OK2Say</b></p> | <p>Guidepost noted that in Policy 8400 School Safety Information that the designated person to receive information from law enforcement, prosecutors, and the court</p> |
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<sup>240</sup> “Eagle Security Fire & Life Safety, Inc. Quotation / Agreement,” Eagle Security Fire & Life Safety, Inc., Jul. 15, 2020.

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|                          | officials including receipt of the information provided from the Michigan State Police relating to the student safety act hotline (“OK2Say”) name the Executive Director of School Safety, Operational Technology, and Student Services. <sup>241</sup> |
| <b>Priority Ranking:</b> | <b>Low Moderate</b>   |
| <b>Recommendation:</b>   | Guidepost recommends updating this to include the Executive Director of School Operations, Director of Cybersecurity and Operational Technology, School Safety Administration, and Security Specialist II.  |

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| <b>Observation 36<br/>Supplemental Lights</b> | The assessors observed multiple exterior light poles that appear to be supplemental in nature in the median islands. These light poles have local accessible transformers and power throws. Easy accessibility could allow for potential vandalism or misuse. |
| <b>Priority Ranking:</b>                      | <b>Low Moderate</b>   |
| <b>Recommendation:</b>                        | Install protective cages and lockout capabilities for the electrical components of these light poles to avoid equipment vandalism or misuse.  |

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| <b>Observation 37:<br/>Perimeter Lighting</b> | The area around the property has little to no lighting present during nighttime hours. The areas specifically being referenced are along the western service road (around the electrical pad, between the housing complex, and between the sports fields to the northwest), as well as the green space on the eastern property line between the campus and N Oxford Rd. While Guidepost notes that the weather conditions onsite impacted the lighting conditions at the time of the assessment, this area is still in need of additional lighting levels. |
| <b>Priority Ranking:</b>                      | <b>Low Moderate</b>  |
| <b>Recommendation:</b>                        | Install illumination around the perimeter of the grounds where possible to reduce the amount of dark area present on the campus.   |

<sup>241</sup> Board Policy po8400 SCHOOL SAFETY INFORMATION, Jun. 8, 2021.

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| <p><b>Additional Notes or Photos:</b></p> |  <p style="text-align: center;"><b>Figure 42: Exterior Lighting Conditions</b></p> |
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| <p><b>Observation 38: Security Specialist II Responsibilities</b></p> | <p>Guidepost noted that the Security Specialist II and the School Safety Administrator are responsible for monitoring security surveillance cameras and aiding in the review of security enhancements for OHS. Most of the guidance has been provided via on-the-job training. This has not included opportunities for more in-depth development opportunities in physical security technology systems.</p> |
| <p><b>Priority Ranking:</b></p>                                       | <p><b>Low Moderate</b></p>  |
| <p><b>Recommendation:</b></p>   | <p>Guidepost recommends that the Board and District support physical security professional development for the Security Specialist II and School Safety Administrator in physical security professional development. This support should involve time and resource allocation, such as funding certifications or conference attendance from recognized groups such as ASIS International.</p>               |


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| <p><b>Observation 39: DHS Guidance in OCS Administrative Guidelines</b></p> | <p>Ag8420C Homeland Security Advisory System Alerts (Adopted Mar. 1, 2011) and Ag8420D Homeland Security Terrorist Alert Code Checklist (Adopted Mar. 1, 2011) both refer to systems no longer in use by DHS. The National Terrorism Advisory System (NTAS) is designed to communicate information about terrorist threats by providing timely, detailed information to the public. DHS replace the color-coded alerts of the Homeland Security Advisory System (HSAS) with the NTAS in 2011.</p> |
| <p><b>Priority Ranking:</b></p>   | <p><b>Low Moderate</b></p>  |
| <p><b>Recommendation:</b></p>   | <p>Guidepost recommends that OCS update these administrative guidelines to reflect DHS's current guidance. For more information on NTAS, see <a href="https://www.dhs.gov/national-terrorism-advisory-system">https://www.dhs.gov/national-terrorism-advisory-system</a>. In addition, policy and</p>   |

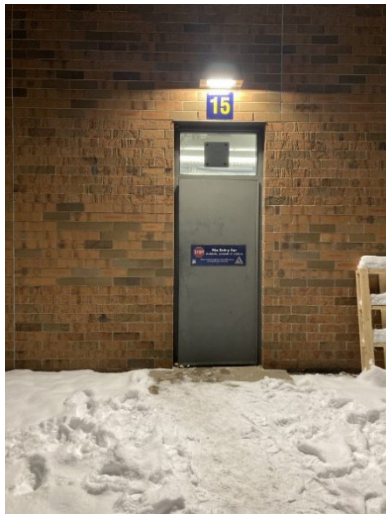

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|  | <p>administrative guidance documents need to be updated on a more regular basis to ensure consistency with emergency and security best practices and requirements. An annual review is beneficial to ensuring the documents are up to date.</p> |
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| <p><b>Observation 40: Key Control for Mass Notification System</b></p> | <p>While onsite, the Guidepost team noted that the key to the mass notification system was in the keyhole of the housing unit. This would provide access to the unit and put it at risk of misuse or compromise.</p> |
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| <p><b>Priority Ranking:</b></p> | <p><b>Low</b></p> |
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| <p><b>Recommendation:</b></p> | <p>Ensure that the keys for the mass notification system are properly controlled in alignment with the key control guidance for OHS. Limited people should have access to the unit.</p> |
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| <p><b>Additional Notes or Photos:</b></p> | <div data-bbox="695 747 1224 1453" data-label="Image">  </div> <p data-bbox="673 1472 1252 1507"><b>Figure 43: Mass Notification System with Keys Present</b></p> |
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| <p><b>Observation 41: Door Numbering</b></p> | <p>Guidepost noted that OHS has applied signs indicating the door numbers across the exterior doors. This is a measure to assist first responders in finding the correct door in response to an emergency. OHS updated the exterior signage following Guidepost’s first site visit and made improvements to the material used for the signage to avoid damage from environmental wear and tear. Specifically, OHS used a blue background with yellow lettering. OHS has also applied signage with a key icon to inform responders which doors can be opened from the exterior. This is another excellent measure to limit confusion in an emergency response situation.</p> |
| <p><b>Priority Ranking:</b></p>              | <p><b>Low</b></p>   |
| <p><b>Recommendation:</b></p>                | <p>Numbering the exterior doors is an excellent measure to direct first responder to the correct door, and adding the interior number helps staff to direct emergency services and security to the correct areas. Guidepost recommends auditing the signage for signs of degradation at least twice a year to ensure that the number can be identified.</p>   |
| <p><b>Additional Notes or Photos:</b></p>    | <div style="display: flex; justify-content: space-around;">   </div> <p style="text-align: center;"><b>Figures 44 and 45: Exterior and Interior Door Numbering</b></p>   |

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| <p><b>Observation 42: Dumpster Area</b></p> | <p>A dumpster courtyard near Door 9 is in poor repair and provides a possible place of concealment. The area contains signs of graffiti. The team also noted chairs and wooden scaffolds.</p>      |
| <p><b>Priority Ranking:</b></p>             | <p><b>Low</b></p>  |
| <p><b>Recommendation:</b></p>               | <p>Repair the fencing around the dumpsters, remove signs of graffiti, and secure the area in a safe way to avoid unintended use. Remove additional items stored outside that could be misused.</p> |

Additional Notes or Photos:



Figure 46: Graffiti



Figure 47: Broken Fencing

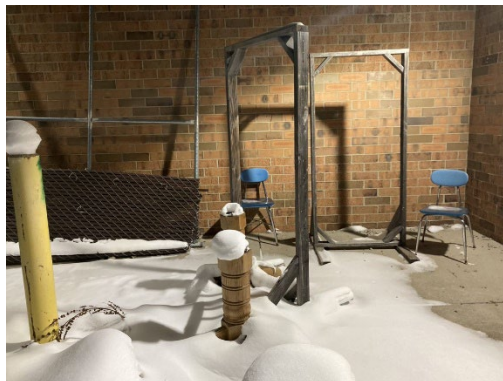
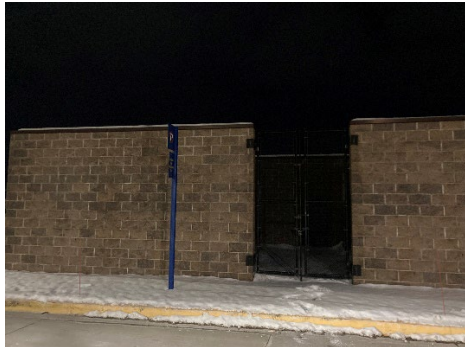




Figure 48: Scaffolding and Chairs Stored Outside

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| <b>Observation 43:<br/>Electrical Pad</b> | No anti-climb protective measures are in place around the electrical pad located on the western drive of the property. This can result in potential unauthorized access to the area for sabotage, staging, illicit activities, or encampment. |
| <b>Priority Ranking:</b>                  | <b>Low</b>  |
| <b>Recommendation:</b>                    | Install anti-climb measures to the top of the existing electrical pad walls to reduce the possibility of unauthorized access. This can include decorative fencing extensions or other anti-climb fence extensions.                            |
| <b>Additional Notes or Photos:</b>        | <div style="text-align: center;">  <p><b>Figure 49: Electrical Pad - Existing Walls</b></p> </div>  |

|  |   |
|--|---|
| <b>Observation 44:<br/>Football Field Access</b> | The assessors accessed the football field through an unlocked gate at the time of the site visit. Though this could have been a momentary condition, it is possible that this gate remains unlocked or accessible. Leaving this large typically unpopulated area open and unmonitored can result in illicit activities, vandalism, staging, encampment, or concealment opportunities. |
| <b>Priority Ranking:</b>                         | <b>Low</b>  |
| <b>Recommendation:</b>                           | All entry points to the football field should be locked at all times unless in use or supervised. This will reduce the possibility that the athletic field is used in undesired manners.  |
| <b>Additional Notes or Photos:</b>               | <div style="text-align: center;">  </div>   |



**Figure 50: Unlocked Gate**

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|--|--|
| <b>Observation 45:<br/>Tennis Courts</b> | The assessors accessed the tennis courts through a damaged gate at the time of the site visit. Leaving this large typically unpopulated area open and unmonitored can result in illicit activities or vandalism. |
| <b>Priority Ranking:</b>                 | <b>Low</b>   |
| <b>Recommendation:</b>                   | Repair the entry area of the tennis court fencing to reduce the likelihood of individuals gaining access for undesired reasons.  |
| <b>Additional Notes or Photos:</b>       | <div style="text-align: center;">  </div> <p style="text-align: center;"><b>Figure 51: Tennis Court Entry</b></p>              |

|   |  |
|---|--|
| <b>Observation 46:<br/>Lighting<br/>Maintenance</b> | During the lighting assessment conducted at night, the assessors discovered a door that had a luminaire with one bulb completely out and another flickering.   |
| <b>Priority Ranking:</b>                            | <b>Low</b>   |
| <b>Recommendation:</b>                              | Have routine exterior patrols by either a roving security officer or maintenance personnel on a routine basis to identify potential lighting malfunctions or outages. Identifying, reporting, and fixing lighting issues quickly will reduce the possibility of dark adaptation which can create areas of ambush, concealment, or other opportunistic actions. |

|  |   |
|--|---|
| <b>Observation 47: SRO Terminology</b> | Guidepost reviewed the 2021 to 2022 SRO Agreement. The name of the program in place for OCSD to provide a police officer to the District is actually School Liaison Office Program; however, for the purposes of the agreement, the job title of the law enforcement officer is SRO. <sup>242</sup>   |
| <b>Priority Ranking:</b>               | <b>Low</b>  |
| <b>Recommendation:</b>                 | Guidepost notes that in some areas of the country, the terms SRO and School Liaison Officer (SLO) refer to two different approaches to law enforcement presence in schools. The term SRO refers primarily to a law enforcement officers posted at a school site to provide continual coverage. For most schools, this typically involves an SRO being based at a high school or middle school and also supporting elementary schools as needed. For the SLO model, a law enforcement may be contracted to provide support to the district but not afforded a specific school location from which to work. The intent is for the officer to move through a list of schools in a geographical area and provide support as needed. In the SLO model, the officer is not posted at a specific school. To avoid ambiguity and to clarify the intent of the SRO roles to be based on the high school and middle school, Guidepost recommends updating the OSCD’s agreement with the District to reflect the term SRO, rather than SLO. Guidepost notes that the document references the terminology concern and provides context for the language used. |
| <b>Additional Notes or Photos:</b>     |   |

|                                    |  |
|------------------------------------|--|
| <b>Observation 48: Alarm Panel</b> | Communication failures noted on the keypads should be investigated by the security integrator. A communication failure could prevent a central station from receiving alerts on an intrusion alarm. It is also best practice to provide unique alarm codes to staff who have the authority to arm and disarm the system; this way, when one or more of the authorized staff leave, their unique code can be removed from the intrusion alarm system. |
| <b>Priority Ranking:</b>           | <b>Low</b>   |
| <b>Recommendation:</b>             | Work with the integrator to determine the reason for the communication failure notice on the alarm panel.  |

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<sup>242</sup> “Oxford Community Schools District School Resource Officer Interlocal Cooperation Agreement 2021 to 2022,” Oxford Community Schools, 2021.

Additional Notes or Photos:



Figure 52: Honeywell Home Alarm Panel with Communication Failure Notice

## APPENDIX A – DOCUMENTATION RECEIVED AND REVIEWED

Guidepost obtained and reviewed relevant information where possible and available. Guidepost's document requests and statuses and/or responses are described below:

- Architectural Plans of the High School
  - OCS provided floor plans of OHS but not the full architectural plans. OCS informed Guidepost that the District is undertaking a comprehensive school mapping project with the support of Ron Murphy of Precision Scanning. The maps will be used in the EOP and for other security-related considerations.
- Governance Documents Related to Security and Emergency Management
  - OCS directed Guidepost to the Board Policies and Guidelines through BoardDocs®, the platform used to house the Board policies, administrative guidelines, and forms.
- Security Post Orders
  - OCS provided the post orders for the new security contractor. Guidepost notes that OCS recently transitioned contract security companies and signed the agreement with the current company on February 22, 2023.<sup>243</sup>
- Security Staffing Plans / Loaded Schedules
  - OCS provided the security staffing plans / loaded scheduled for the new security contractor. Guidepost notes that the OCS recently transitioned contract security companies and signed the agreement with the current company on February 22, 2023.
- Security Incident Reports / Records for the Past Three Years
  - OCS did not provide full security incident reports or records for the past three years. Guidepost interviewed stakeholders on past security events, reviewed media publications, and conducted a crime analysis. The second report will discuss prior security incidents at OHS.
- Security Training Records
  - OCS provided security training records for the new security contractor. OCS recently transitioned contact security companies and has not yet provided the security training records for the officers assigned to OHS.
- Security Integrator Service Records
  - OCS provided historical documents that relate to the security integrator's records. The security integrator did not provide these documents directly to Guidepost but was interviewed by Guidepost.
- Documentation on the ALICE Training

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<sup>243</sup> "Service Contract for Fortis Group, LLC and Oxford Community Schools," Oxford Community Schools, Feb. 23, 2023.

- Through the document disclosure, Guidepost identified training records for ALICE from 2020. OCS did not provide training records for 2021 and 2022 for ALICE.
- Records of Emergency Drills
  - OCS did not provide records of emergency drills.
- District Emergency Management Plan
  - On March 23, 2023, Guidepost reviewed a draft of the OCS EOP. This is a district plan and not a school-specific plan. OCS explained that once the Board approves the draft District EOP, the school plans will be developed. Due to the impact that public dissemination of the EOP's confidential sections could pose to OCS's security posture, Guidepost agreed that it would review the draft EOP under the conditions set by OCS, namely:
    - Guidepost will review, but not take into possession any physical or electronic copy of the EOP;
    - Guidepost will not retain any notes or create any work product in connection with the review of the confidential portions of the EOP; and
    - Guidepost will not report on any substance of the review of the confidential sections of the EOP and will not state what our recommendations were, if any. As it relates to the confidential sections of the EOP, our public reporting will be limited to confirmation that Guidepost reviewed the draft EOP for best practices and made recommendations, if any, consistent with that standard.
- High School Emergency Action Plan
  - This plan does not currently exist, as OCS is preparing the individual school plans following the Board's approval of the District's draft EOP.
- As-Built Security Systems Documentation and Documented System Standards
  - OCS did not provide as-built security systems documentation and documented system standards. Guidepost notes that clients do not always have access to this information directly if it was not provided by the integrator at the time of installation. In addition, not all clients have developed security technology systems standards, though this is a best practice.
- Security Software and Service Level Agreements
  - OCS provided documentation on the security software and contracts in place. The discovery process revealed some security service level documentation related to the security integrator.
- Security Technology Maintenance and Operations Manuals and Documentation
  - OCS did not provide specific documentation on security technology maintenance, and the security integrator declined to provide this documentation. Through open-source information, Guidepost was able to access some security technology manuals.
- Information Pertaining to Physical Security Measures
  - OCS directed Guidepost to the Safety and Security page on its website.
- Previous Security Assessment Reports and Documentation

- OCS directed Guidepost to the Secure Education Consultants' Oxford Community School District Assessment Report (March 2022).
- Interviewees also referenced a report completed by the Assistant Superintendent in charge of Security and School Operations prior to November 30, 2021.<sup>244</sup> Guidepost identified a K-12 School Protective Measures Assessment Summary dated Fall 2019 as well as a Physical Safety Assessment Notes and/or Action Items List dated September 18, 2019.

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<sup>244</sup> Jill Lemond

## APPENDIX B – INTERVIEWS CONDUCTED

Guidepost interviewed the following stakeholders who voluntarily met with us to provide their insights.

### **Threat and Suicide Assessments**

- Dacia Beazley, OHS Principal, Oxford Community Schools
  - Monday, December 5, 2022
- Kurt Nuss, OHS Assistant Principal, Oxford Community Schools
  - Friday, February 17, 2023
- Kristy Gibson-Marshall, OHS Assistant Principal, Oxford Community Schools
  - Friday, February 17, 2023
- Kevin Nelms, OHS Assistant Principal, Oxford Community Schools
  - Monday, December 5, 2022
- Mitch Brooks, OHS Dean of Students, Oxford Community Schools
  - Monday, December 5, 2022
- Mike Brennan, OHS Counselor, Oxford Community Schools
  - Wednesday, December 14, 2022
- Charles Jergler, OHS Counselor, Oxford Community Schools
  - Thursday, September 15, 2022
  - Wednesday, December 14, 2022
- Pamela Fine, OHS Family-School Liaison, Oxford Community Schools
  - Thursday, January 19, 2023
- Kevin Kalbfleisch, OHS Family-School Liaison, Oxford Community Schools
  - Wednesday, September 7, 2022
- Jim Rourke, OHS Security, Oxford Community Schools
  - Wednesday, January 4, 2023
- Jason Louwaert, (former) SRO, Oakland County
  - Friday, February 10, 2023
- Scott Rafalski, SRO, Oakland County
  - Tuesday, December 20, 2022
- Justin Barnes, SRO, Oakland County

- Monday, December 5, 2022
- Brad Bigelow, OMS Principal, Oxford Community Schools
  - Wednesday, January 11, 2023
- Carl Sproul, OMS Assistant Principal, Oxford Community Schools
  - Wednesday, January 11, 2023
- Kristie Staterstad, OMS Assistant Principal, Oxford Community Schools
  - Wednesday, January 11, 2023
- Heather Thick, OMS Counselor, Oxford Community Schools
  - Wednesday, January 11, 2023
- Chris Gill, OMS Counselor, Oxford Community Schools
  - Wednesday, January 11, 2023
- Matt Santala, OVA Assistant Principal and Tech Director, Oxford Community Schools
  - Wednesday, January 11, 2023
- Lynn Ramos, School Social Worker - Clear Lake Elementary & Leonard Elementary, Oxford Community Schools
  - Friday, March 10, 2023
- Adam Rainey, School Psychologist – Elementary Schools, Oxford Community Schools
  - Friday, March 10, 2023
- Ken Weaver, (former) Superintendent, Oxford Community Schools
  - Friday, February 10, 2023
- Jill Lemond, (former) Assistant Superintendent of Safety & School Operations, Oxford Community Schools
  - Wednesday, June 8, 2022
  - Thursday, September 8, 2022
- Allison Willemin, Executive Director of School Operations, Oxford Community Schools
  - Wednesday, February 1, 2023
- James Vernier, School Safety Administrator, Oxford Community Schools
  - Wednesday, January 11, 2023
- Todd Barlass, Executive Director of Student Services & Wellness, Oxford Community Schools
  - Wednesday, January 11, 2023
- Angela Weaver, Administrative Assistant to the Superintendent, Oxford Community Schools
  - Wednesday, January 11, 2023



- Wednesday, March 22, 2023
- Dewey Cornell, Ph.D, School-Based Threat Assessment Expert, University of Virginia
  - Tuesday, February 14, 2023
- Jason Russell, President, Security Education Consultants (SEC)
  - Thursday, June 16, 2022

## Physical Security

- Jason Russell, President Security Education Consultants (SEC)
  - Thursday, June 16, 2022
- Jill Lemond, Assistant Superintendent of Safety & School Operations, Oxford Community Schools
  - Thursday, June 16, 2022
- Saso Vasovski, Director of Cybersecurity and Operational Technology, Oxford Community Schools
  - Tuesday, July 19, 2022
- Trevor Marshall, District Technician, Oxford Community Schools
  - Tuesday, July 19, 2022
- Agron Poti, Eagle Security Fire & Life Safety, Inc.
  - Tuesday, October 11, 2022
- Justin Barnes, SRO
  - Monday, December 5, 2022
- Scott Rafalski, SRO
  - Tuesday, December 20, 2022
- Jim Rourke, OHS Security Officer
  - Wednesday, January 4, 2023
- James Vernier, School Safety Administrator, Oxford Community Schools
  - Wednesday, January 11, 2023
- Dr. Allison Willemin, Executive Director of School Operations, Oxford Community Schools
  - Tuesday, February 1, 2023
- Steven Wolf, Assistant Superintendent of Secondary Instruction
  - Thursday, February 9, 2023
- Tony DeMare, Athletic Director, OHS

- Friday, February 10, 2023
- Sam Barna, Assistant Superintendent of Business & Operations
  - Friday, March 17, 2023
- Brian T. Bastianelli, Chief Executive Officer, Fortis Group, LLC
  - Tuesday, April 25, 2023
- Michael Fluhart, Field Supervisor for Oxford Community Schools, Fortis Group LLC
  - Monday, May 1, 2023

## APPENDIX C – DISTRICT GOVERNANCE DOCUMENTATION REVIEWED FOR PHYSICAL SECURITY

- **Administrative Guideline Manual**
  - Administration
    - Administrative Guideline 1421 CRIMINAL HISTORY RECORD CHECK (Adopted Jan. 9, 2018, Revised June 12, 2018)
    - Administrative Guideline 1662 ANTI-HARASSMENT (Adopted Dec. 1, 2015)
  - Program
    - Administrative Guideline 2431D BANNED DRUGS (Adopted Mar. 2011)
  - Professional Staff
    - Administrative Guideline 3121 CRIMINAL HISTORY RECORD CHECK (Adopted Mar. 1, 2011, Revised June 12, 2018)
    - Administrative Guideline 3121.01 CRIMINAL CONVICTION REVIEW PROCESS (Adopted Mar. 1, 2011)
    - Administrative Guideline 3362 ANTI-HARASSMENT (Adopted Mar. 1, 2021, Revised Dec. 1, 2015)
    - Administrative Guideline 3362A REPORTING THREATENING BEHAVIORS (Adopted Mar. 1, 2011)
  - Support Staff
    - Administrative Guideline 4121 CRIMINAL HISTORY RECORD CHECK (Adopted Mar 1, 2011, Revised June 12, 2018)
    - Administrative Guideline 4121.01 CRIMINAL CONVICTION REVIEW PROCESS (Adopted: Mar. 1, 2011)
    - Administrative Guideline 4362 ANTI-HARASSMENT (Adopted Mar. 1, 2011, Revised Dec. 1, 2015)
    - Administrative Guideline 4362A REPORTING THREATENING BEHAVIORS (Adopted Mar. 1, 2011)
  - Students
    - Administrative Guideline 5215 MISSING CHILDREN (Adopted Mar. 1, 2011)
    - Administrative Guideline 5330A EMERGENCY MEDICATION (Adopted Mar. 1, 2011)
    - Administrative Guideline 5340A STUDENT ACCIDENT/ILLNESS/CONCUSSION (Adopted Mar. 1, 2011, Revised Oct. 21, 2014)

- Administrative Guideline 5340B HEALTH EMERGENCIES AND FIRST AID CARE (Adopted Mar. 1, 2011)
- Administrative Guideline 5340D TRANSPORTATION FOR ILL OR INJURED STUDENTS (Adopted Mar. 1, 2011)
- Administrative Guideline 5340.01 CONCUSSIONS AND ATHLETIC ACTIVITIES (Adopted Oct. 21, 2014, Revised June 12, 2018)
- Administrative Guideline 5350 SUICIDE INTERVENTION PROCESS (Adopted Mar. 1, 2011)
- Administrative Guideline 5500a STUDENT CONDUCT IN SCHOOL (Adopted Mar. 1, 2011)
- Administrative Guideline 5517 ANTI-HARASSMENT (Adopted Mar. 1, 2011, Revised Dec. 1, 2015)
- Administrative Guideline 5517.01 BULLYING AND OTHER AGGRESSIVE BEHAVIOR TOWARD STUDENTS (Adopted Mar. 21, 2023)
- Administrative Guideline 5520 STUDENT DISORDER (Adopted Mar. 1, 2011, Revised Oct. 2, 2019)
- Administrative Guideline 5530 DRUG PREVENTION (Adopted Mar. 1, 2011)
- Administrative Guideline 5600A STUDENT DISCIPLINE (Adopted Mar. 1, 2011)
- Administrative Guideline 5605A DISCIPLINING STUDENTS WITH DISABILITIES (IDEA ELIGIBLE) (Adopted Mar. 1, 2011, Revised May 13, 2016)
- Administrative Guideline 5605B DISCIPLINING A STUDENT WITH DISABILITIES (Adopted Mar. 1, 2011)
- Administrative Guideline 5610 EMERGENCY REMOVAL, SUSPENSION, AND EXPULSION OF STUDENTS (Adopted Mar. 1, 2011, Revised Apr. 29, 2020), Administrative Guideline 5610.02 IN-SCHOOL DISCIPLINE (Adopted Mar. 1, 2011)
- Administrative Guideline 5610.03 TEACHER INITIATED SUSPENSION (Adopted Mar. 1, 2011)
- Administrative Guideline 5630a ALTERNATIVES TO CORPOREAL PUNISHMENT (Adopted Mar. 1, 2011)
- Administrative Guideline 5630b USE OF PHYSICAL FORCE (Adopted Mar. 1, 2011)
- Administrative Guideline 5771 SEARCH AND SEIZURE (Adopted Mar. 1, 2011)
- Administrative Guideline 5772 WEAPONS (Adopted Mar. 1, 2011)
- Administrative Guideline 5840A YOUTH GANGS (Adopted Mar. 1, 2011)
- Administrative Guideline 5840B RESPONSE TO GANG-RELATED INCIDENTS AND/OR SUSPICION OF GANG INVOLVEMENT (Adopted Mar. 1, 2011)
- Administrative Guideline 5860 SAFETY PATROL (Adopted Mar. 1, 2011)

- Property
  - Administrative Guideline 7430 SAFETY IN SCHOOLS (Adopted Mar. 1, 2011)
  - Administrative Guideline 7440 BUILDING SECURITY AND KEY CONTROL (Adopted Mar. 1, 2011, Revised Feb. 21, 2023)
  - Administrative Guideline 7440.01 VIDEO SURVEILLANCE AND ELECTRONIC MONITORING (Adopted Mar. 1, 2011, Revised Sep. 16, 2020)
  - Administrative Guideline 7440.03 SMALL UNMANNED AIRCRAFT SYSTEMS (Adopted Feb. 17, 2020)
  - Administrative Guideline 7510A FACILITY USAGE GUIDELINES (Adopted Aug. 28, 2013)
  - Administrative Guideline 7530B CLASSROOM TELEPHONES (Adopted Mar. 1, 2011)
  - Administrative Guideline 7540A STAFF AND STUDENT TRAINING REGARDING THE INTERNET (Adopted Dec. 6, 2016, Revised Feb. 1, 2017)
  - Administrative Guideline 7540.03 STUDENT TECHNOLOGY ACCEPTABLE USE AND SAFETY (Adopted Mar. 1, 2011, Revised Oct. 11, 2019)
  - Administrative Guideline 7540.04 STAFF TECHNOLOGY ACCEPTABLE USE AND SAFETY (Adopted Oct. 30, 2015, Revised Oct. 11, 2019)
  - Administrative Guideline 7540.09 SOCIAL MEDIA GUIDELINES FOR FACULTY & STAFF (Adopted Aug. 26, 2015)
  - Administrative Guideline 7540.10 SOCIAL MEDIA GUIDELINES FOR STUDENTS (Adopted Aug. 26, 2015)
  - Administrative Guideline 7540.11 SOCIAL MEDIA GUIDELINES FOR PARENTS/VOLUNTEERS (Adopted Aug. 26, 2015)
- Operations
  - Administrative Guideline 8321 CRIMINAL JUSTICE INFORMATION SECURITY (NON-CRIMINAL JUSTICE AGENCY) (Adopted Jan. 27, 2017, Revised Feb. 17, 2023)
  - Administrative Guideline 8351 SECURITY BREACH OF CONFIDENTIAL DATABASES (Adopted Mar. 1, 2011)
  - Administrative Guideline 8400 SCHOOL SAFETY (Adopted Mar. 1, 2011)
  - Administrative Guideline 8400A THREAT ASSESSMENT AND INTERVENTION (Adopted Sep. 13, 2022)
  - Administrative Guideline 8410 CHARACTERISTICS OF A SCHOOL THAT IS SAFE AND RESPONSIVE TO ALL CHILDREN (Adopted Mar. 1, 2011)
  - Administrative Guideline 8401a EARLY WARNING SIGNS OF POSSIBLE SCHOOL VIOLENCE (Adopted Mar. 1, 2011)

- Administrative Guideline 8410b IDENTIFYING AND RESPONDING TO IMMINENT WARNING SIGNS (Adopted Mar. 1, 2011)
- Administrative Guideline 8410c PRINCIPLES UNDERLYING INTERVENTION (Adopted mar. 1, 2011)
- Administrative Guideline 8410E ACTION PLANNING CHECKLIST (Adopted Mar. 1, 2011)
- Administrative Guideline 8410F CRISIS PROCEDURE CHECKLIST (Adopted Mar. 1, 2011)
- Administrative Guideline 8410G CHARACTERISTICS OF A SAFE PHYSICAL ENVIRONMENT (Adopted Mar. 1, 2011)
- Administrative Guideline 8410H TIPS FOR PARENTS (Adopted Mar. 1, 2011)
- Administrative Guideline 8420 EMERGENCY SITUATIONS AT SCHOOLS (Evacuation, Fire, Tornado, Lockdown, Unusual) (Adopted Mar. 1, 2011)
- Administrative Guideline 8420C HOMELAND SECURITY ADVISORY SYSTEM ALERTS (Adopted Mar. 1, 2011)
- Administrative Guideline 8420D HOMELAND SECURITY TERRORIST ALERT CODE CHECKLIST (Adopted Mar. 1, 2011)
- Administrative Guideline 8420A PANDEMICS AND OTHER MEDICAL EMERGENCIES (Adopted Mar. 1, 2011)
- Administrative Guideline 8420F BIOTERRORISM (Adopted Mar. 1, 2011)
- Administrative Guideline 8430 TELEPHONING OF BOMB THREATS (Adopted Mar. 1, 2011)
- Administrative Guideline 8431 WRITTEN HAZARD COMMUNICATION PROGRAM (Adopted Mar. 1, 2011)
- Administrative Guideline 8452 USE OF AUTOMATIC EXTERNAL DEFIBRILLATORS (AED) (Adopted Mar. 1, 2011)
- Administrative Guideline 8462 CHILD ABUSE OR NEGLECT (Adopted Mar. 1, 2011)
- Administrative Guideline 8600 TRANSPORTATION (Adopted Mar. 1, 2011)
- Administrative Guideline 8605 BUS SAFETY PROCEDURES (Mar. 1, 2011, Revised Oct. 2, 2019)
- Forms
  - Property
    - 7410F2 GYMNASIUM EQUIPMENT SAFETY CHECKLIST
    - 7440 F1 VIDEO SURVEILLANCE RECORDING RELEASE FORM
    - 7510B F1 REQUEST FOR USE OF FACILITIES FORM

- Operations
  - 8420 F1 REPORT OF FIRE DRILLS
  - 8420 F2 EMERGENCY SCHOOL CLOSING
- Relations
  - 9150 F1 VISITS TO THE SCHOOL
- Policy Manual
  - Administration
    - Policy 1422 CRIMINAL HISTORY RECORD CHECK (Adopted Jan. 9, 2018, Revised June 12, 2018)
    - Policy 1616 STUDENT SUPERVISION AND WELFARE (Adopted Aug. 22, 2012)
    - Policy 1662 ANTI-HARASSMENT (Adopted Apr. 1, 2014, Revised Feb. 21, 2023)
  - Professional Staff
    - Policy 3121 CRIMINAL HISTORY RECORD CHECK (Adopted Aug. 27, 1996, Revised June 12, 2018)
    - Policy 3217 WEAPONS (Adopted Aug. 27, 1996, Revised June 8, 2021)
    - Policy 3362 ANTI-HARASSMENT (Adopted Aug. 27, 1996, Revised Oct. 18, 2022)
    - Policy 3362.01 THREATENING BEHAVIOR TOWARD STAFF MEMBERS (Adopted Aug. 11, 2020)
    - Policy 3362.02 WORK PLACE SAFETY (Adopted Apr. 4, 2018)
  - Support Staff
    - Policy 4121 CRIMINAL HISTORY RECORD CHECK (Adopted Jan. 14, 2003, Revised June 12, 2018)
    - Policy 4121.01 CRIMINAL CONVICTION REVIEW (Adopted Feb. 13, 2007)
    - Policy 4213 STUDENT SUPERVISION AND WELFARE (Adopted Aug. 27, 1996, Revised Aug. 22, 2012)
    - Policy 4217 WEAPONS (Adopted Aug. 27, 1996, Revised June 8, 2021)
    - Policy 4362 ANTI-HARASSMENT (Adopted Aug. 27, 1996, Revised Feb. 21, 2023)
    - Policy 4362.02 WORKPLACE SAFETY (Adopted Apr. 4, 2018)
  - Students
    - Policy 5340 STUDENT ACCIDENTS AND EMERGENCY ILLNESS (Adopted Aug. 27, 1996)
    - Policy 5350 STUDENT SUICIDE (Adopted Feb. 28, 2023)
    - Policy 5500 STUDENT CONDUCT (Adopted Aug. 27, 1996)

- Policy 5516 STUDENT HAZING (Adopted Feb. 13, 2007)
- Policy 5517 ANTI-HARASSMENT (Adopted Aug. 27, 1996, Revised Feb. 21, 2023)
- Policy 5517.01 BULLYING AND OTHER AGGRESSIVE BEHAVIOR (Adopted Feb. 13, 2007, Revised Feb. 28, 2023)
- Policy 5530 DRUG PREVENTION (Adopted Aug. 27, 1996, Revised June 1, 2004)
- Policy 5600 STUDENT DISCIPLINE (Adopted Aug. 27, 1996)
- Policy 5605 SUSPENSION/EXPULSION OF STUDENTS WITH DISABILITIES (Adopted Apr. 27, 2009)
- Policy 5610 EMERGENCY REMOVAL, SUSPENSION, EXPULSION OF STUDENTS (Adopted Aug. 27, 1996, Revised Dec. 8, 2020)
- Policy 5610.02 IN-SCHOOL DISCIPLINE (Adopted Sep. 14, 1999, Revised July 14, 2020)
- Policy 5610.03 TEACHER INITIATED SUSPENSION (Adopted Sep. 14, 1999)
- Policy 5630 CORPORAL PUNISHMENT (Adopted Aug. 27, 1996)
- Policy 5771 SEARCH AND SEIZURE (Adopted Aug. 27, 1996, Revised Sep. 10, 2019)
- Policy 5772 WEAPONS (Adopted June 1, 2004, Revised Mar. 16, 2016)
- Property
  - Policy 7217 WEAPONS (Adopted June 1, 2004, Revised June 8, 2021)
  - Policy 7430 SAFETY STANDARDS (Adopted Aug. 27, 1996)
  - Policy 7440 BUILDING SECURITY AND KEY CONTROL (Adopted Aug. 27, 1996, Revised Dec. 8, 2020)
  - Policy 7440.01 VIDEO SURVEILLANCE AND ELECTRONIC MONITORING (Adopted June 8, 2021)
  - Policy 7440.03 SMALL UNMANNED AIRCRAFT SYSTEMS (Adopted Jan. 7, 2020, Revised Apr. 11, 2023)
  - Policy 7510 USE OF SCHOOL FACILITIES (Adopted Aug. 27, 1996, Revised June 19, 2013)
  - Policy 7540.09 SOCIAL MEDIA POLICY - STAFF (Adopted Aug. 26, 2016)
  - Policy 7540.10 SOCIAL MEDIA POLICY - STUDENT (Adopted Aug. 26, 2015)
  - Policy 7540.11 SOCIAL MEDIA POLICY – VOLUNTEER (Adopted Aug. 26, 2015)
  - Policy 7544 USE OF SOCIAL MEDIA (Adopted July 9, 2019)
- Operations
  - Policy 8142 CRIMINAL HISTORY RECORD CHECK (Adopted Apr. 1, 2014, Revised Jan. 9, 2018)



- Policy 8142.01 WEAPONS (Adopted Oct. 25, 2016)
- Policy 8351 SECURITY BREACH OF CONFIDENTIAL DATABASES (Adopted Apr. 27, 2009)
- Policy 8400 SCHOOL SAFETY INFORMATION (Adopted Apr. 1, 2004, Revised June 9, 2021), Policy 8402 EMERGENCY OPERATIONS PLAN (Adopted May 28, 2019)
- Policy 8405 ENVIRONMENTAL HEALTH AND SAFETY ISSUES (Adopted Dec. 18, 2013)
- Policy 8420 EMERGENCY SITUATIONS AT SCHOOLS (Adopted Aug. 27, 1996, Revised Aug. 27, 2014)
- Policy 84420 REPORTING ACCIDENTS (Adopted Aug. 27, 1996)
- Policy 8462 STUDENT ABUSE AND NEGLECT (Adopted 27, 1996, Revised Aug. 11, 2020)
- Relations
  - Policy 9150 SCHOOL VISITORS (Adopted Aug. 28, 2007, Revised Feb. 26, 2008)
  - Policy 9150.01 DANGEROUS WEAPONS (Adopted Aug. 28, 2007)
  - Policy 9160 PUBLIC ATTENDANCE AT SCHOOL EVENTS (Adopted Aug. 28, 2007, Revised Dec. 18, 2013)

## APPENDIX D – CRIME ANALYSIS

*Note: The Crime Analysis plays an important role in determining external crimes that may impact the educational institution environment; however, this analysis is not equivalent to an assessment of the risk of an active aggressor or a targeted attack against the institution. Guidepost includes this information to provide a fuller picture of the risks impacting the institution’s environment and surrounding area.*

To understand the crime risk environment for OHS, Guidepost compiled a CRIMECAST® Report. The report analyzes major categories of crime and provides risk ratings for the area relative to regional and national averages. Guidepost included the full CRIMECAST® Report with methodology description.

The Crimes Against Persons and Crimes Against Properties (CAP) Index<sup>245</sup> provides crime risk forecasting to help organizations make better-informed decisions through the security planning and security management cycle. The CAP Index uses a sequential process developed and refined for over 30 years by a team of criminologists, researchers, and data architects. The CAP Index Scoring System uses a proprietary algorithm to generate crime risk scores (CAP Scores) to provide a relative measure of the likelihood that crime and loss will occur at any address in the U.S., Canada, the United Kingdom, or Mexico. The CAP Index was founded in 1988 by a criminology professor and a research statistician.

While Guidepost does not promote or sell specific products or technologies, it often uses CRIMECAST® data for engagements as the methodology allows the ability to compare the risk environment across multiple locations in a true comparison without the need to control such factors as the difference in crime rate calculation methods and/or definitions of certain crimes among law enforcement organizations. The scores do not indicate exactly how many incidents of specific crimes have taken place; rather, they provide an assessment of the likelihood of crime occurring in specific locations that would permit more effective allocation of security measures.<sup>246</sup>

### CRIMECAST® Process

The CRIMECAST® scores are generated using one of five scoring methodologies (Block Group, MAX-1, MAX-3, MAX-6, MAX-12) based on the function of the target site. These scoring methodologies account for the fact that perpetrators often travel varying distances to commit crimes (the “journey to crime”) depending on the target. The scoring methodologies also consider the nature and attractiveness of different types of targets for different types of crimes. The information used to inform the scores comes from several sources, including neighborhood data, national crime surveys, local police data, and company crime loss reports from major industries within the surrounding environment.

Scores are on a scale of 0 – 2,000. A score of 100 is the national, state, and county average risk of crime. A score of 300 means risk of crime for the location is three times the national average. A score of 25 means the risk of crime for the location is one-quarter of the national average. Criminal activity is further broken down into two categories: Crimes Against Persons and Crimes Against Property. This approach encircles a location with an inner radius of one mile or whatever radius encompasses a population of 25,000 people, whichever being smaller, as well as an outer radius of three miles or 100,000 people.

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<sup>245</sup> “Pioneering the Location-Based Crime Risk Industry,” CAP Index, 2023 (<https://capindex.com/who-we-are/history/>).

<sup>246</sup> *Id.*

CRIMECAST® also provides a site map that shows a Block Group Score for each neighborhood surrounding a given location. This is the area immediately surrounding a site. The Census Bureau defines 242,747 block groups in the U.S.<sup>247</sup> CRIMECAST® assigns every Block Group a numeric risk score and corresponding risk shading.

Crimes included in this analysis are:

- Crimes Against Persons
  - Homicide
  - Rape
  - Robbery
  - Aggravated Assault
- Crimes Against Property
  - Burglary
  - Larceny
  - Motor Vehicle Theft

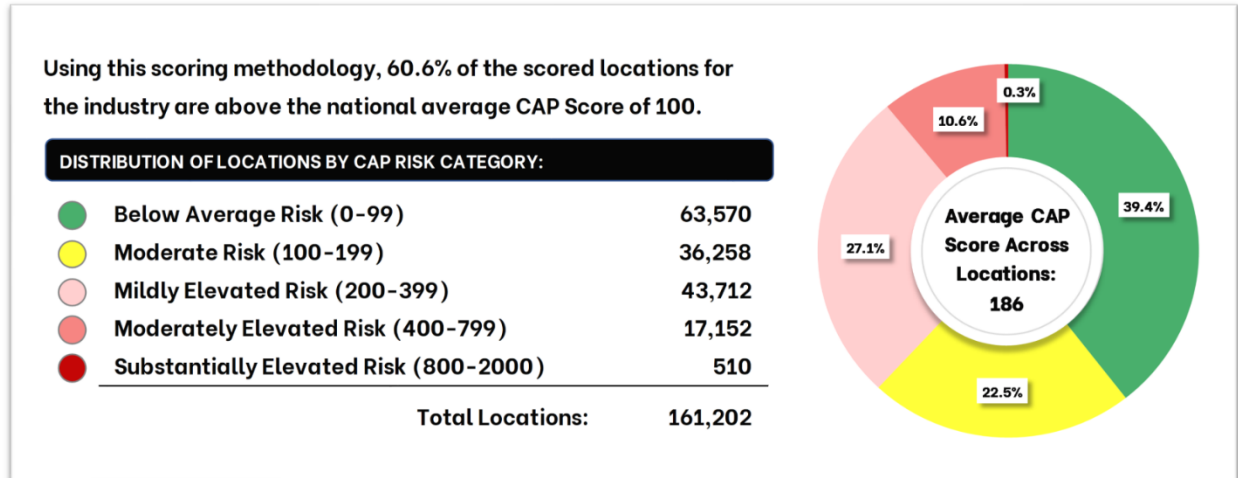
CRIMECAST® notes that the most widely used methodology for educational institutions is the MAX-6 Methodology, which has an inner radius of 2 miles or 100,000 people and an outer radius of 6 miles of 400,000 people.<sup>248</sup>

When assessing how the OHS campus compares with the crime risk environment for educational institutions across the country, Guidepost used the *CRIMECAST® Industry Benchmark Analysis for Primary & Education – 2022*. The analysis provides a distribution across 161,002 primary and secondary educational institution locations in the United States. The MAX-6 methodology indicates that the average CAP Index Score across the locations surveyed was 186, which is nearly twice the national average. When analyzed vis-à-vis the distribution of locations by CAP Risk category, as shown in figure below, the CAP Index score for OHS for the MAX-6 Methodology is far below the national average of the educational institutions surveyed in the study. OHS's overall CRIMECAST® score is 48, which means that at least 60.6% of primary and secondary education sites had a score higher than OHS's score.

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<sup>247</sup> "2020 Census Tallies of Census Tracts, Block Groups & Blocks," U.S. Census Bureau, Jul. 18, 2022 (<https://www.census.gov/geographies/reference-files/time-series/geo/tallies.html>).

<sup>248</sup> *CRIMECAST® Industry Benchmark Analysis for Primary & Education – 2022*, CAP Index, 2023.

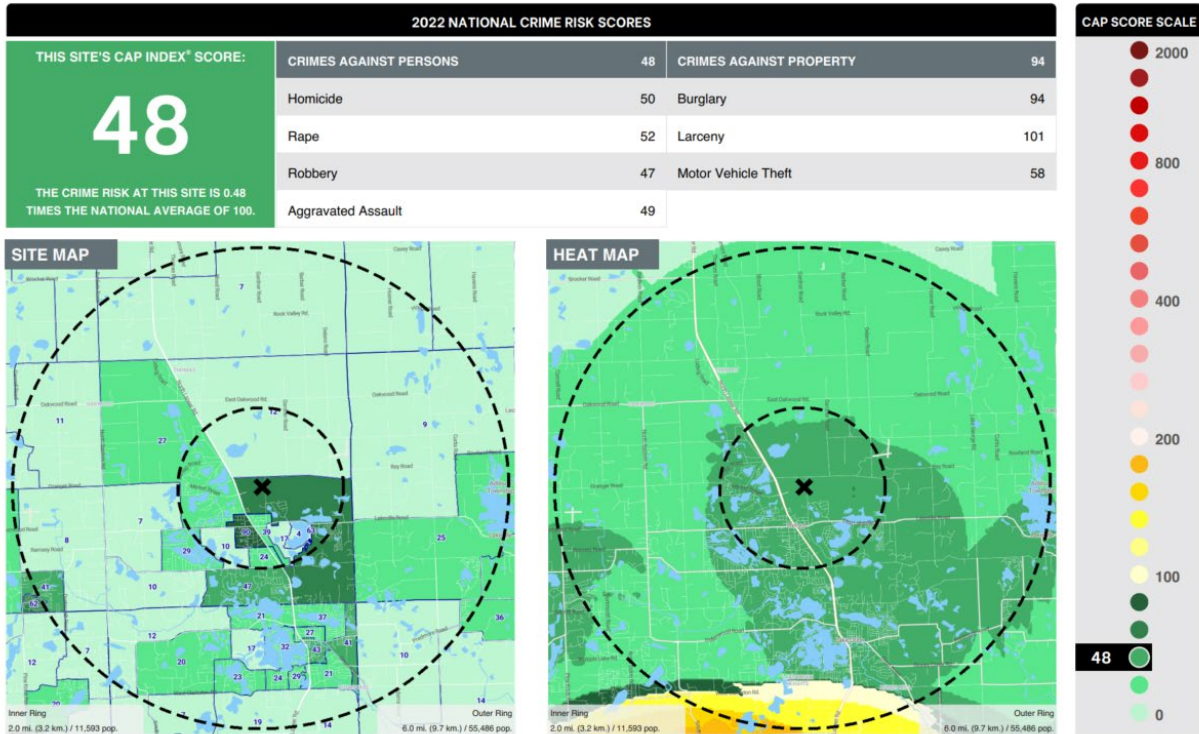


**Figure 53: CRIMECAST® Benchmarking Study for Primary & Secondary Education—2022**

The highest crime risk scores derive from Burglary (101) and Larceny (94). The score has not changed since 2010 when it was also 48. In 2027, CRIMECAST® projects that the score will decrease slightly to 46. The Crimes Against Persons score is 48, which has decreased slightly from the score in 2010, which was 51. CRIMECAST® projects that the score will increase slightly to 50 in 2027. The Crimes Against Property score is 94, which has increased since 2010 when the score was 89. CRIMECAST® projects that the score will decrease to 87 in 2027. OHS’s Block Group has a score of 63, which is still under the national average but higher than the MAX-6 Methodology score.

When compared with the average score for the state of Michigan, the scores are in close alignment but slightly higher. This means that the overall CRIMECAST® score for the state of Michigan is lower than that of the U.S. overall. In comparison with the state of Michigan, the score for OHS is 57. The score indicates that the crime risk environment surrounding OHS is slightly higher than half the state score for Michigan.

When compared with the overall CRIMECAST® score for Oakland County, the scores are higher, indicating that the CRIMECAST® score for Oakland County is lower than that of the scores of the U.S. and Michigan overall. In comparison to Oakland County, the score is 87, meaning it is slightly under the county average for Oakland County.



**Figure 54: Site and Heat Maps for MAX-3 Methodology**

In the MAX-3 Methodology, the score for OHS is 52, which is slightly higher than half the national average. Again, OHS’s Block Group score (63) is higher than the MAX-3 score. The highest CRIMECAST® categories are Burglary (106) and Larceny (97). The Crimes Against Persons category score is 54, which is slightly higher than half the national average. The Crimes Against Property score is 99, which is in alignment with the national average score.

When compared with the average CRIMECAST® evaluation for the state of Michigan, the area shows a score of 65 with the scores for Crimes Against Persons at 64, and the Crimes Against Property at 142. While the Crimes Against Persons score is under the state average, the Crimes Against Property score is 1.42 times that state average for Michigan. This indicates that the crime level for the state of Michigan is slightly lower than the national average for the U.S.

When compared against Oakland County, the CAP Index® Score is 94, indicating the crime risk for the area is in alignment with the county crime risk. Guidepost notes that the Crimes Against Persons category was 97 while the Crimes Against Property category score was 157, meaning that the property crime risk is 1.57 times the county average score.

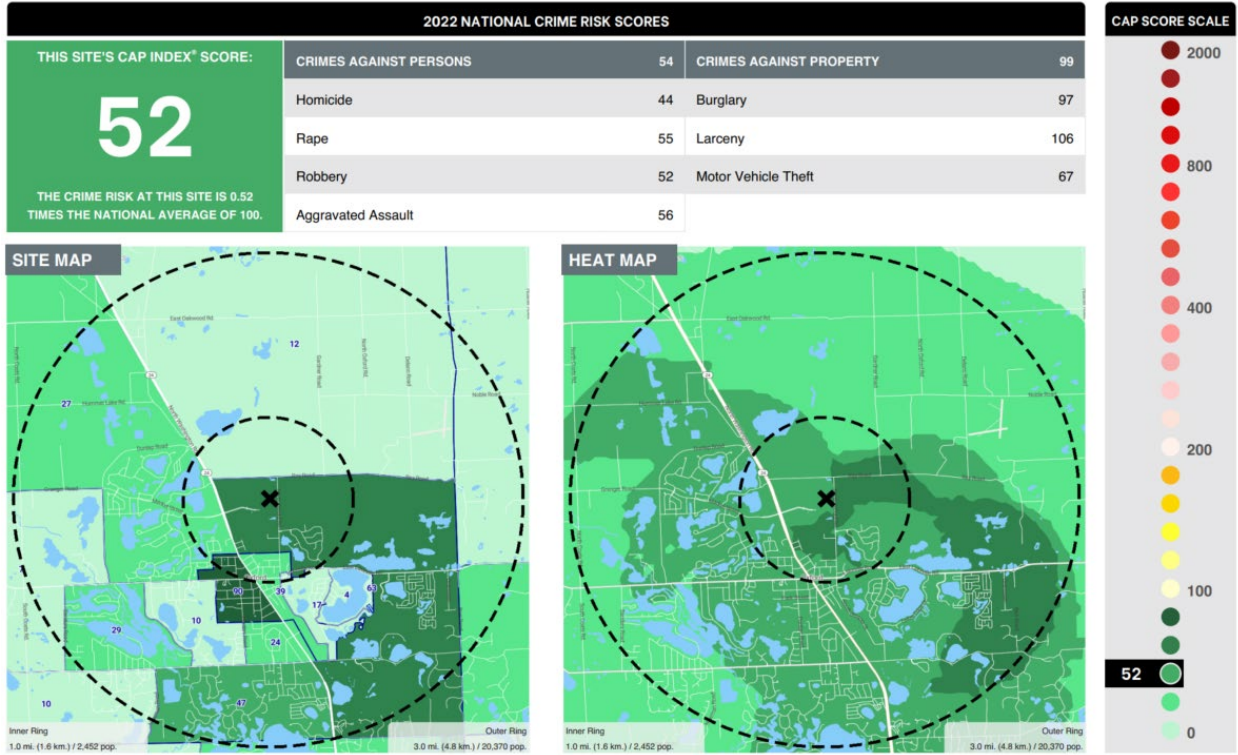


Figure 55: Site and Heat Maps for MAX-33 Methodology

## APPENDIX E - NATURAL HAZARDS RISK

When conducting physical security assessments, Guidepost believes that it is important to consider natural hazards as they can impact the specific security measures in place and help identify other risks that could have a higher likelihood or impact than security risks otherwise identified.

### Natural Hazards Review

In general, Guidepost noted that the area surrounding OHS in Oakland County in Michigan (Census Tract 26125121000) has a **Relatively Low Risk** for natural hazards. To evaluate natural risks relevant to the campus, Guidepost utilized the Federal Emergency Management Agency's (FEMA) National Risk Index.<sup>249</sup> The National Risk Index is a dataset and online tool to evaluate risk to U.S. communities from 18 hazard types: Avalanche, Coastal Flooding, Cold Wave, Drought, Earthquake, Hail, Heat Wave, Hurricane, Ice Storm, Landslide, Lightning, Riverine Flooding, Strong Wind, Tornado, Tsunami, Volcanic Activity, Wildfire, and Winter Weather.

FEMA designed and built the National Risk Index in close collaboration with various stakeholders and partners in academia, local, state, and federal governments, and private industry. The Risk Index draws upon available source data for natural hazard and community risk factors to develop a baseline relative risk measurement for each U.S. County and Census Tract. The National Risk Index is intended to help users better understand the natural hazard risk for their communities.

### Methodology

Guidepost documented the overall Risk Index score, as well as scores for Expected Annual Loss, Social Vulnerability, and Community Resilience. Data for Expected Annual Loss comes from federal and state agencies, academia, and other research institutions. The types of data used vary across hazard types, as do the periods of record. The Social Vulnerability component of the National Risk Index is supported by the Social Vulnerability Index (SoVI), and Community Resilience is supported by the Baseline Resilience Indicators for Communities (BRIC). Both indices are provided by the Hazards and Vulnerability Research Institute (HVRI) at the University of South Carolina.

The National Risk Index provides relative Risk Index scores and ratings based on data for Expected Annual Loss due to natural hazards, Social Vulnerability, and Community Resilience. Separate scores and ratings are also provided for each component: Expected Annual Loss, Social Vulnerability, and Community Resilience. For the Risk Index and Expected Annual Loss, scores and ratings can be viewed as a composite score for all hazards or individually for each of the 18 hazard types. Scores are calculated using the equations:

- Risk Index = Expected Annual Loss × Social Vulnerability ÷ Community Resilience
- Expected Annual Loss = Exposure × Annualized Frequency × Historical Loss Ratio

A community's score describes its relative position among all other communities at the same level for a given component. For example, a county's Risk Index score and rating is relative to all other counties in the United States, and a Census tract's Risk Index score and rating is relative to all other Census tracts in the United States.

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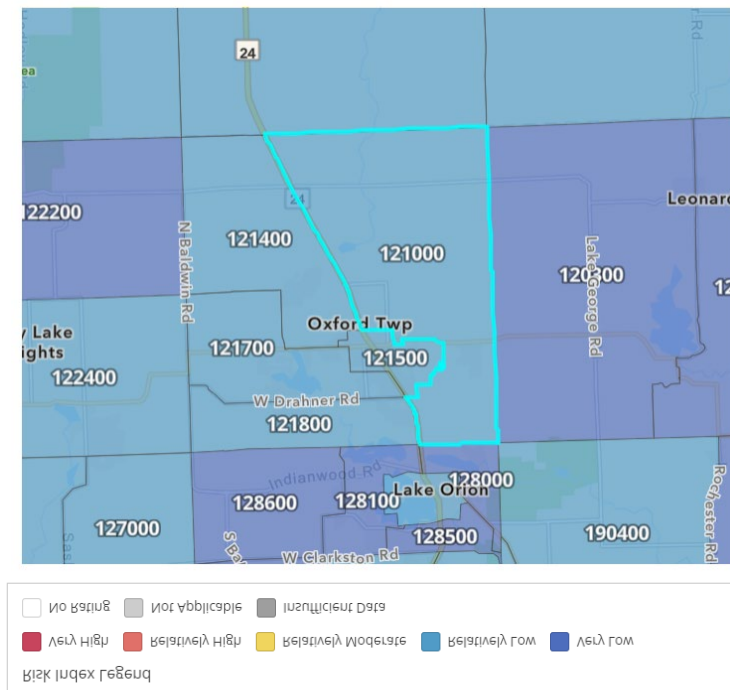
<sup>249</sup> "Census Tract 26125121000, Oakland County, Michigan," National Risk Index, Apr. 22, 2023 (<https://hazards.fema.gov/nri/report/viewer?dataLOD=Census%20tracts&dataIDs=T26125121000>).

All scores are constrained to a range of 0 (lowest possible value) to 100 (highest possible value). To achieve this range, the values of each National Risk Index component are rescaled using min-max normalization. For Expected Annual Loss specifically, a cube root transformation is applied before min-max normalization.

For every score, a qualitative rating describes the nature of a community's score in comparison to all other communities at the same level, ranging from "Very Low" to "Very High." To determine ratings, a methodology known as k-means clustering or natural breaks is applied to each score.<sup>250</sup>

## Natural Risk

FEMA's National Risk Index's rating for Census Tract 26125121000, Oakland County is **Relatively Low** compared to the rest of the U.S. According to FEMA, 42% of U.S. Census Tracts have a lower Risk Index than this area, and 82% of census tracts in Michigan have a lower Risk Index. The Risk Index Score for Oakland County is 42.35 out of 100. As shown in the figure below, the risk index score for the OHS campus census tract is considered **Relatively Low**.

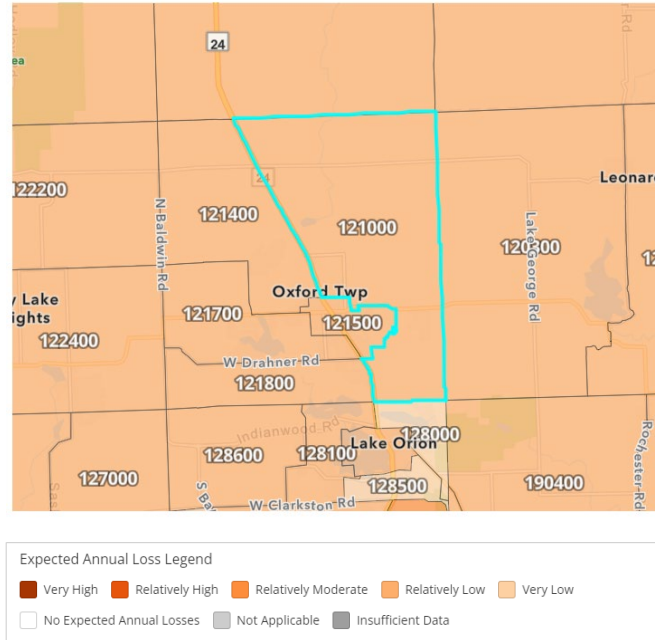


**Figure 56: Risk Index**

In this census tract, the Expected Annual Loss due to natural hazards is **Relatively Low** (39.74) when compared to the rest of the U.S. This area has 14 out of the 18 designated hazard types that contribute to the Expected Annual Loss. FEMA notes that 40% of U.S. census tracts have a lower Expected Annual Loss than this area. When compared to the rest of Michigan, this census tract has a lower Expected Annual Loss than 77% of Census Tracts in Michigan.

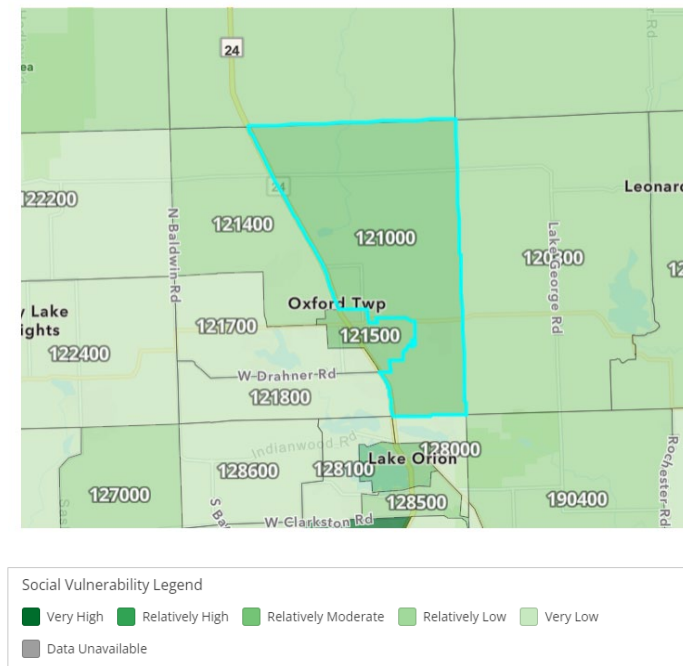
<sup>250</sup> For more information on FEMA's National Risk Index, please see <https://hazards.fema.gov/nri/>.





**Figure 57: Expected Annual Loss Evaluation**

Social groups in this area have **Relatively Moderate** (53.63) susceptibility to the adverse impacts of natural hazards compared to the rest of the U.S. The percentile within Michigan is 0.60. According to FEMA, 54% of U.S. Census Tracts have a lower Social Vulnerability score, and 1% of Census tracts in Michigan have a lower Social Vulnerability score.



**Figure 58: Social Vulnerability Evaluation**

This area has a **Very High** ability to prepare for anticipated natural hazards, adapt to changing conditions, and withstand and recover rapidly from disruptions when compared to the rest of the U.S. The score for the tract is 84.57. According to FEMA, 16% of U.S. Census Tracts have a higher Community Resilience Score, and 99% of Census Tracts in Michigan have a higher Community Resilience.

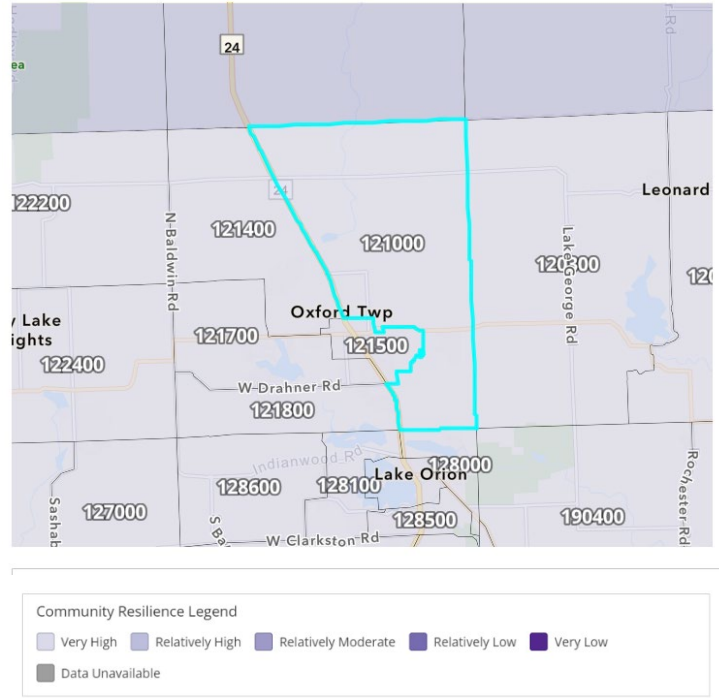


Figure 59: Community Resiliency Evaluation

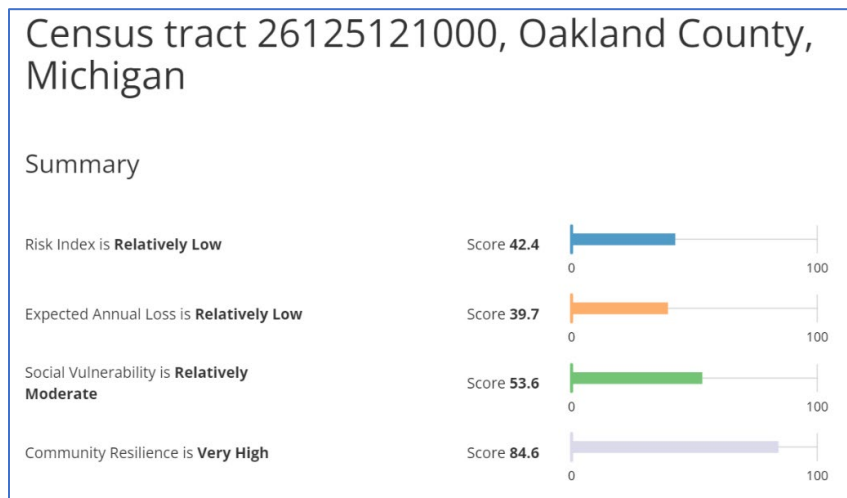


Figure 60: FEMA National Risk Index Summary

Overall, Guidepost identified a relatively low natural hazards risk for the area surrounding OHS. Indeed, the area has a Very High Community Resilience evaluation, which indicates that when natural hazards occur, the community often has time to prepare in advance. Guidepost notes that the Social Vulnerability score is Relatively Moderate indicating that residents can face challenges in the aftermath of a natural hazards event in the area; however, the Expected Annual Loss is Relatively Low based on the natural hazards likely for this area.