

February 28, 2018

Representative Rita Allison, Chair  
SC House of Representatives Education  
and Public Works Committee  
Room 429, Blatt Building  
P.O. Box 11867  
Columbia, S.C. 29211

Dear Chairwoman Allison and Members of the General Assembly:

The SC Advisory Council for Educating Students with Disabilities, the SC Association of School Psychologists, the SC Council of Administrators of Special Education and the SC Council for Exceptional Children request careful consideration in regards to school safety legislation, specifically H. 4966 being proposed for mandated monthly Active Shooter Drills. While we are in agreement schools need to be prepared for these situations, there needs to be flexibility for school districts to decide how to best prepare based upon their student and staff population. Schools serve a diverse population and a “one size fits all approach” is counterproductive and could be harmful.

More specifically, any legislation regarding active shooter/assailant drills as a mandated requirement needs to include wording that does not require highly sensorial drills but allows for a continuum of developmentally appropriate activities to prepare schools. Wording should specifically state that drills need to be carefully planned by a multidisciplinary group of professionals to include school administration, special education teachers, school mental health professionals (i.e., school psychologists, school counselors, school social workers), school resource officers, and law enforcement to ensure thoughtful and careful planning that minimizes highly sensorial experiences that have been known to cause negative impact to students and staff (see below). Careful consideration is also needed to ensure that all policies and practices are inclusive and account for individual circumstances and student(s) with disabilities. The attached document, *Best Practices Considerations for Schools in Active Shooters and Other Armed Assailant Drills*, details the important considerations involved and how to conduct these drills responsibly.

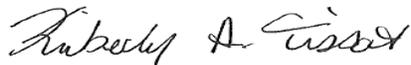
Legislation should also include *proactive measures* that must be taken to prevent or mitigate an active shooter/armed assailant situation. We are asking the legislature to support the implementation of research-based behavioral threat assessment and management (BTAM)

training and include protocols that account for students with disabilities. Further, every effort should be made to avoid crafting legislation that would criminalize students for behaviors that may be a manifestation of their disability. Early identification can stop the pathway to violence. We are also asking for increased investment in school-employed mental health service providers and school-based mental health services; research clearly shows early intervention, school connectedness, and an increased focus on social-emotional learning increases academic scores and decreases behavioral and mental health problems ([www.casel.org](http://www.casel.org)). We need to be more proactive, not reactive; this is what saves lives.

Additionally, the legislature should be well-informed before enacting legislation focused upon arming educators to prevent and reduce dangerous school setting events. Arming teachers is not the answer, and this poses unintended significant risks (see below). As an alternative to arming educators with firearms, we advocate/propose arming educators with increased training in trauma-informed practices, positive behavior interventions and supports and interventions matched to student need.

Thus, we are asking legislators to carefully craft legislative wording to ensure a bill does not lead to unintended consequences for school districts, staff, and students. Our associations and councils are available to provide guidance and support in the development of legislative language that will enhance school safety for the children and youth of South Carolina. Additional information regarding proposed language or supplemental information can be accessed through contacting Dr. Melissa Reeves, Associate Professor, Winthrop University and Immediate Past-President, National Association of School Psychologists ([reevesm@winthrop.edu](mailto:reevesm@winthrop.edu)) or Ms. Beth Howell, SCASP President ([scasp.president@gmail.com](mailto:scasp.president@gmail.com)).

Sincerely,



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Attachments:

*Additional Information for Consideration of Active Assailant Drills, Threat Assessments and Arming Educators*  
*Best Practices Considerations for Schools in Active Shooters and Other Armed Assailant Drills*  
*Questions to Ask When Considering Armed Assailant Training - Fact Sheet*  
*NASP Statement Opposing Arming Teachers*  
*NASRO Statement Against Arming Teachers*

cc.      The Honorable Henry McMaster, Governor  
            Representative Marvin Pendarvis  
            Representative John R.C. King  
            Representative Nathan Ballentine  
            Representative Wendell Gilliard  
            Representative Robert Williams  
            Representative Leola Robinson-Simpson  
            Representative Roger Kirby  
            Representative Lonnie Hosey  
            Representative Jerry Govan, Jr.  
            Representative Joseph H. Jefferson, Jr.  
            Representative Bill Clyburn  
            Representative William Wheeler, III  
            Representative Cezar E. McKnight  
            Representative Katie Arrington  
            Representative Russell Ott  
            Representative Ronald Young  
  
            Representative Ashley Trantham  
            Representative Rosalyn Henderson-Myers  
            Representative Chip Huggins  
            Representative Richard Martin  
            Representative Michael Rivers, Sr.  
            Representative Lucas Atkinson  
            Representative Lin Bennett  
            Representative Robert Brown  
            Representative Laurie Slade Funderburk  
            Representative Jonathan Hill  
            Representative Dennis C. Moss  
            Representative Michael Pitts  
            Representative Samuel Rivers  
            Representative L. Kit Spires  
            Representative Ivory Torrey Thigpen  
            Representative J. David Weeks

## *Additional Information for Consideration*

### **Considerations for Active Shooter/Active Assailant Drills**

Extreme caution needs to (be) utilized for the wording of any bill including mandates for active shooter training. If not worded correctly, there are individuals and companies that will assume active shooter training equates to utilizing highly sensorial drills and exercises (simulated gun shots, fake blood, teaching staff/students to fight the intruder) and schools could unintentionally be exposing teachers and youth to a traumatizing experience or activating the effects of a previous trauma. At least two known lawsuits have been filed against school districts who implemented these highly sensorial drills. Teachers ended up with physical injuries, and one was diagnosed with PTSD after the active shooter drill experience. These results are avoidable. We don't light a fire in the hallway to practice fire drills; thus, we don't need to expose students and staff to highly sensorial experiences in order to prepare for an active shooter. There are more appropriate ways we can do this to ensure this preparedness does not lead to unintended consequences.

The National Association of School Psychologists (NASP) and the National Association of School Resource Officers (NASRO) have collaborated to provide guidance on more appropriate ways to conduct such drills to minimize risk. This document, *Best Practices Considerations for Schools in Active Shooters and Other Armed Assailant Drills*, details the important considerations involved. Along with this document, you will find a streamlined list of considerations for school districts to use when implementing such drills. For your convenience, both of these documents are attached to this letter and we ask you consider this document when crafting language for the bill.

Information regarding multiple legal complaints can be found at:

<http://www.schoolsecurity.org/2014/09/school-active-shooter-drills-trigger-lawsuit-injury-claims/>

<https://www.wsj.com/articles/active-shooter-drills-spark-raft-of-legal-complaints-1409760255>

<http://safehavensinternational.org/lawsuit-filed-school-employee-injured-alice-training/>

[http://www.oregonlive.com/pacific-northwest-news/index.ssf/2015/04/teacher\\_terrified\\_by\\_surprise.html](http://www.oregonlive.com/pacific-northwest-news/index.ssf/2015/04/teacher_terrified_by_surprise.html)

### **Considerations for Behavioral and Threat Assessment Management**

It is important that risk factors are considered to prevent incidents and promote safe school environments. The signors ask the legislature to require that schools receive trainings in standardized behavioral and threat assessment management (BTAM) protocols that:

- (1) Are research-based,
- (2) Consider students with disabilities, and
- (3) Direct the multi-disciplinary teams completing the assessments to management and intervention steps to assist the student in need. NASP has also provided substantive guidance which is attached.

## **Considerations for Arming Educators**

Statements from NASP and the NASRO (also attached) underline the need for safety in schools while refraining from arming educators. These armed staff with limited assailant training create barriers for law enforcement in active assailant events resulting in more dangerous environments. Unintended consequences include the following: What if a student gets a hold of the teacher's gun? What if a teacher loses emotional control and decides to pull the gun out? Would the armed teacher be penalized if she/he failed to respond in the expected way? What if there is an active shooter situation and the teacher accidentally shoots a student while trying to shoot the assailant; is the teacher going to be brought up on murder charges? Trained law enforcement, with hundreds of hours of training, have less than 30% accuracy in hitting their target in a real-life active shooter situation; teachers receive far less training. Instead, we propose increased requirements to arm educators with increased training in trauma-informed practices, positive behavior interventions and supports and interventions matched to student need.