

Comprehensive School Safety Plans

by John Czajkowski, MA

IN THIS BRIEF:

- ▶ Components and requirements of Comprehensive School Safety Plans
- ▶ Sample questions for board members
- ▶ Relevant guidance and resources
- ▶ Relevant board policies and administrative regulations

Overview of the Comprehensive School Safety Plan

A foundational component of every local educational agency's (LEA) school safety strategy is the annual development and approval of sites' Comprehensive School Safety Plans (CSSPs). These mandated plans allow governing boards to review school safety strategies in detail. As members of the governance team, your familiarity with CSSPs is a critical way to prepare for and respond appropriately to safety issues within your schools.

What are CSSPs?

According to the California Department of Education (CDE), "California Education Code (EC) Section 32281(a) requires every kindergarten through grade twelve school, public and public charter, including community and court schools, to develop and maintain a CSSP designed to address campus risks, prepare for emergencies, and create a safe, secure learning environment for students and school personnel." LEAs with an average daily attendance of 2,500 or under may adopt a single CSSP for all schools within the district.¹

The law requires that designated community members convene each year to review and approve their school's CSSP. Designated community members include either the School Site Council or the site's designated safety planning committee, which is to be made

up of a principal/designee, teacher, parent of a child who attends the school, classified employee, and others (EC Section 32281(b) (2)). The plan must be updated and approved by **March 1 each year**. Additionally, the district and county office of education must notify the CDE by **Oct. 15** if a school has not submitted its plan. CDE provides a compliance tool on its website with requirements and recommendations to aid in the development and revision of a CSSP.²

Additionally, new legislation, Senate Bill (SB) 553, requires all employers with more than 10 employees to establish, implement, and maintain a workplace violence prevention plan. Best practices for LEAs would be to continue to coordinate and collaborate across departments, staff, and with partners to ensure that both the CSSP and the new Workplace Violence Prevention Plan (WVPP) are written, edited, and updated in tandem. More information on SB 553 is available in the resources section of this document.

While the law does not explicitly require that governing boards approve the plan, (merely "the district"), in practice, many governing boards review and approve the plans prior to adoption.³ This review process offers governance teams an opportunity to consult with district staff about safety practices and provide guidance. An understanding of the plan's details also supports alignment of the budget to safety practices.

The following section provides an overview of CSSPs: the required elements, best practices for school districts and county offices of education (COEs), and relevant resources.

Required CSSP components

State law outlines the many different components CSSPs must include to address the complex issues of school safety. The following is not an exhaustive list, but rather broad categories of the different components of the plan:

- ▶ assessment of school crime or crimes at school-related functions
- ▶ procedures for reporting child abuse and neglect
- ▶ disaster procedures, routine and emergency plans, and crisis response plan with adaptations for pupils with disabilities
- ▶ procedures to allow a public agency to use school buildings, grounds, and equipment for mass care and welfare shelters during an emergency

- ▶ suspension/expulsion policies and rules and procedures on school discipline
- ▶ a discrimination and harassment policy that includes hate crime reporting procedures
- ▶ bullying and cyberbullying education and prevention strategies
- ▶ procedures for conducting tactical responses to criminal incidents, including individuals with guns on campuses and procedures for safe entrance and exit (ingress and egress) of students, parents/guardians, and school employees to and from school sites.

A full list of requirements can be found on the CDE's website [here](#).

Components of CSSP implementation

The California Education Code has provided clear mandates for the overall process of CSSP development and approval. In 2018, Assembly Bill 1747 strengthened the existing EC requirements in several ways. Among them:

- ▶ all staff must be trained in the safety plans
- ▶ there must be cooperation with classified employees in developing the plans
- ▶ local fire departments must be consulted
- ▶ procedures for tactical responses must be included

Additionally, the bill created new requirements for the CDE to help support these state-mandated local programs.

To make the most of the CSSP, an LEA's plan should not be merely a compliance document, tucked away on a shelf and gathering dust. Developing and reviewing the plan is an opportunity for a thorough consideration of the district's or COE's approach to school safety. Referencing the board calendar is a tool that can be used to stay abreast of the review cycle.

Comprehensive safety planning requires comprehensive study

Many school safety conversations originate around topics of responding to school shootings or other dramatic emergencies. Some conversations originate around themes of prevention. Other conversations may consider infrastructure improvements. Ideally, CSSPs should consider the complete process across infrastructure, partnerships, procedures, and community. According to the California Governor's Office of Emergency Services (Cal OES), these include:

- ▶ **Prevention/mitigation:** Prevention and mitigation is any sustained action taken to reduce or eliminate long-term risk to people and property from natural- or human-caused hazards and their effects. This definition distinguishes actions that have

a long-term impact from those more closely associated with immediate preparedness, response, and recovery activities.

- ▶ **Preparation:** Preparation involves activities undertaken in advance of an emergency to develop and enhance operational capacity to respond to and recover from an emergency. As part of a comprehensive preparedness program, the emergency management community (districts, counties, and tribes) should develop plans and procedures, maintain prevention programs, manage resources, establish mutual aid agreements, train personnel, and educate the schools.
- ▶ **Response:** Response activities comprise the immediate actions to save lives, protect property and the environment, and meet basic human needs. An example is evacuating school children to higher ground during a tsunami emergency. It is important to have points of contacts from the following partners: local law enforcement, fire departments, local offices of emergency services, COEs, the American Red Cross, and other local resources that can assist.
- ▶ **Recovery:** Recovery refers to actions to restore the learning environment for schools affected by an event. Recovery is an extended period that blends into the "before" timeframe of the next hazard event for a community and should include steps to build back better so that future natural hazards have lesser impacts.⁴

Since the plans must address both natural disasters as well as human threats, it is recommended that LEAs assist schools with structures and systems to help build capacity through a continuous cycle of improvement that analyzes a suitably broad spectrum of data. Multiple data points can be reviewed and analyzed. Some examples include office referrals, attendance rates and school attendance review board data, suspension and expulsion data, the California Healthy Kids Survey, school improvement plan, local law enforcement juvenile crime data, and property damage data.

LEAs should encourage and support schools in assessing comprehensive campus safety through multiple means. Beyond studying regional geographic and climate risks, schools leaders should analyze attendance and discipline records, the California Healthy Kids survey and [Social Emotional Learning survey](#) results, community criminal and incident data, (LEAs can request this information from their local law enforcement partner), and [infrastructure physical assessment](#) to help establish a wider appraisal of campus and LEA trends. This is particularly important as LEAs continue to transition out of the pandemic.

For more information and resources on emergency response and crisis communication see [\[hyperlinks to come\]](#).

CSSP best practices: School districts

School districts are responsible for the overall development of CSSPs for their schools. [EC Section 32281(a)].⁵

To align with CSSP best practices, school districts can:

- ▶ provide training, support, guidance, and oversight to schools
- ▶ maintain policies and procedures and collect relevant data
- ▶ connect and build relationships with local emergency response teams and understand their respective roles before a safety concern or disaster
- ▶ coordinate developmentally appropriate fire and active shooter/ intruder drills with emergency response teams
- ▶ create a districtwide safety committee comprised of schools, first responder agencies, and school safety groups and hold regular meetings
- ▶ provide a liaison to schools to oversee and coordinate school safety planning, implementation, and emergency management
- ▶ document and track to confirm safety plan adoptions and approvals occur in a timely manner at the school and district levels
- ▶ provide a school safety plan template to all LEA sites
- ▶ encourage teacher and student participation in curriculum-based school safety planning programs
- ▶ require schools to conduct site assessments, participate in the activity at the school site, and support improvements
- ▶ annually participate in the Great California ShakeOut™ to prepare for an earthquake⁶
- ▶ partner with schools to create or improve a threat assessment team

A district's threat assessment team can also meet to identify, review, and address threats or potential threats to school safety. Threat assessment teams review incidents of threatening behavior by students (current and former), caregivers, staff, or other individuals. For more information, please refer to the Behavioral Threat Assessment section of the Safe Schools Toolkit.

CSSP best practices: County offices of education

COEs are responsible for the overall development of CSSPs for their schools including court, community, and alternative schools. [EC Section 32281(a)].⁷

To align with CSSP best practices, COEs can:

- ▶ provide training, support, and oversight
- ▶ maintain policies and procedures
- ▶ collect applicable data and connect with education agencies
- ▶ ensure that COE-operated schools coordinate with partnering agencies in the development of CSSPs
- ▶ require districts to verify that schools in their jurisdictions have compliant CSSPs

- ▶ host countywide safety committee meetings and trainings; communicate with safety directors and coordinators in districts and schools
- ▶ create and maintain relationships with law enforcement, fire representatives, local business, and community partners
- ▶ utilize online and in-person trainings offered by the Readiness and Emergency Management for Schools (REMS) Technical Assistance Center⁸
- ▶ annually participate in the Great California ShakeOut™ to prepare for the next earthquake⁹

Authentic collaboration helps foster physical and school climate safety

Although physical infrastructure helps foster school safety, comprehensive safety in education settings is characterized by a symbiotic relationship between both the physical and the behavioral human elements of safety — mental, emotional, psychological, and social. Thus, developing schools safety plans that are truly comprehensive requires authentic input from a range of employees, students, and parents, along with guidance from local law enforcement and fire department partners. It is recommended that governance teams encourage site leaders to foster an authentic team-based process for collaboration rather than one that is strictly “top-down.”

For example, districts can adopt training programs that encourage group participation, including a train-the-trainer program for various safety committee members, school staff, and administrators. The training can include drafting CSSP goals, role playing, and presentations on threat reporting and assessment, Multi-Tiered System of Supports (MTSS), crisis communication, substance awareness, de-escalation, and reunification.

Documenting an authentic collaborative process

Districts, ideally working in conjunction with COEs, are encouraged to provide CSSP templates that house all standardized elements with areas of site input, from straightforward elements to those that require more collaboration, creativity, and innovation through the site team. It is a best practice to house these documents in a standardized, centralized, and digital platform that can be easily revised at district and site levels.

LEAs might consider providing clear timelines for completion and structured support. Furthermore, LEAs are advised to review and critique the plans through a centralized internal process before sending them to governing boards or superintendents for approval prior to the annual March 1 deadline. A centralized accountability system places a responsibility on the LEA to support the sites with training and resources. Governance team members should inquire about the process to clarify if there are ways to improve engagement in CSSP development.

Protect sensitive information in posted plans

While California Education Code requires that LEAs make their CSSP available to the public, not all components should be included. Access to CSSPs must be carefully controlled to protect sensitive tactical information such as specific response protocols, private personal information such as cell phone numbers, student information such as evacuation care instructions for students with disabilities, and other items that would be inappropriate to post publicly.

It is recommended that LEAs provide a redacted version to help share key elements with the community in a controlled manner without compromising the aforementioned details. The large size of a typical CSSP makes for an unwieldy document in its totality, so it is recommended that key quick reference sections are made available to site administration through various means that balance rapid access with information management.

Help schools prioritize components

Not all emergencies move at the same speed or have the same potential scope of impact, so it is recommended that LEAs help schools build capacity to respond competently to the most fast-moving situations at times when prevention has not been successful, or even possible. In a state with as much geographic, climate, and social diversity as California, some regions may need to plan for coastal flooding, whereas others may need to plan more for wildfires, and others for a possible dam failure. Some larger LEAs may need to be ready for several potential disasters, such as for an earthquake or an active shooter.

District leaders must distinguish between having a CSSP with merely an exhaustive selection of protocols on paper versus one that authentically expresses the extended network of school leadership, staff, and first responders working together over time to build real capacity to better prepare for natural disasters and human emergencies.

State and national resources

The CDE has provided a collection of resources on the [Safe Schools Planning](#) website that includes summaries of mandates, compliance checklists, and more. This valuable CDE resource provides elements to help LEAs protect not only physical safety, but school climate — which has a profound relationship with the former. Additionally, the U.S. Department of Education's [Readiness and Emergency Management for Schools](#) website is an outstanding source of regularly updated general guidance, training materials, and many other resources.

CSSP implementation considerations and processes should be substantively supported by the LEA to help interpret and structure the copious guidance available. The LEA will not be the only resource provider, but it ultimately must approve the plans.

A best practice is for the LEA to provide a template, trainings, and structured goal-setting opportunities. The district provides timelines

and supports for the site to develop and complete, and then provides review, feedback, and evaluation prior to the approval process. This is a time-consuming process and requires knowledgeable leadership and vision. Ideally, large LEAs should consider a dedicated role for the broad functions of a safety and security administrator (director, coordinator, program manager, manager, or similar). For smaller districts, CSSPs may be difficult and time consuming due to existing staff capacities, and education leaders may wish to seek assistance from their county office of education or contract with a recommended professional with experience in safety planning.

Questions for governance teams to consider

CSSPs cover a wide spectrum of safety aspects including infrastructure, protocol, climate, partnerships, community, and the Federal Emergency Management Agency (FEMA) prevention-through-recovery continuum. The following questions are meant to help guide discussions on safety. For more information, please see the Options-Based Response section of the School Safety Toolkit to find more in-depth guidance and information on comprehensive safety.

Staffing and internal coordination

- 1)** Is there an LEA representative identified to oversee the CSSP process?
- 2)** Given the broad scope of CSSPs, are all the related district departments able to collaborate and support developing appropriate, current, and standardized content?
- 3)** At the site level, are all employee groups able to collaborate?
- 4)** Is there support for the unique and specific needs at each school site?
- 5)** How are student and community input incorporated into the planning process?

Partnerships and external coordination

- 1)** Are all relevant law enforcement and fire responders able to provide input to the CSSP development process? If not, how might we improve collaboration with the necessary partners?

Balanced contents for CSSPs

- 1)** Do the contents of the CSSP help address the complete process of prevention, mitigation, preparation, response, and recovery?
- 2)** Do the contents consider these phases across areas of infrastructure, partnerships, procedures, and community?
- 3)** Do the plans address items required by law and also those recommended by our board policies and administrative regulations?

LEA support and documentation

- 1) Does the LEA support school sites over the full process of plan development, local assessment, professional development, training, drills, documentation, and plan approval? If not, what can we do to address the necessary improvements?
- 2) Is there sufficient time allocated on the governance calendar for board review of the plans before the submission deadline?

Relevant resources

State and federal resources

Assembly Bill 1747 (2018) — School safety plans

AB 1747 requires schools to develop safety plans to prepare and respond to safety threats or incidents on or near school sites. By establishing safety guidelines which focus on preparedness, with assistance from the CDE and Department of Justice, schools can enhance their learning environment for all students. The entirety of text of the bill can be found here: <https://bit.ly/3T8KN00>.

Senate Bill 323 (2023–24) — Comprehensive School Safety Plans: Individualized safety plans

SB 323 requires disaster procedures to also include adaptations for pupils with disabilities in accordance with the federal Individuals with Disabilities Education Act and Section 504 of the federal Rehabilitation Act of 1973 and would require the annual evaluation of the CSSP and the annual review of a charter school's school safety plan to also include ensuring that the plan includes appropriate adaptations for pupils with disabilities, as specified. <https://bit.ly/43eeQlz>

Senate Bill 553 (2023-24) — Occupational safety: workplace violence: restraining orders and workplace violence prevention plan

SB 553 requires an employer to establish, implement, and maintain an effective workplace violence prevention plan, to provide training for employees on the plan, and to provide additional training when the plan is updated, or a new workplace violence hazard has been identified. The entirety of text of the bill can be found here: Bill Text - SB-553 <https://csba.pub/3U62cse>

Safe schools planning resources from the CDE

The information provided on this website is intended to help schools identify elements and resources important in improving school climate and safety. <https://bit.ly/31BviZN>

California School Climate, Health, and Learning Surveys

A tool supported by the CDE to help LEAs meet Local Control and Accountability Plan priorities to improve school climate, pupil engagement, parent involvement, and academic achievement. <https://bit.ly/4cgly4U>

Readiness and Emergency Management for Schools (REMS)

The U.S. Department of Education's Office of Safe and Supportive Schools has administered the REMS Technical Assistance (TA) Center to serve two critical functions aimed at helping education agencies, with their community partners, manage safety, security, and emergency management programs. The site is intended to build the preparedness capacity (including prevention, protection, mitigation, response, and recovery efforts) of schools, school districts, Institutions of Higher Education (IHEs), and their community partners at the local, state, and federal levels. It also serves as the primary source of information dissemination for schools, school districts, and IHEs for emergencies via the REMS Technical Assistance Center website. <https://bit.ly/3TjsTI2>

REMS: The Role of Districts in Developing High-Quality School Emergency Plans

The Role of Districts in Developing High-Quality School Emergency Operations Plans (EOPs): A Companion to the School Guide is a guide for districts to fulfill both their individual and shared emergency management planning responsibilities in school EOP development for a range of threats and hazards. The intended audience of this guidance document is school safety leaders and members of core planning teams at school districts. The district guide complements the Guide for Developing High-Quality School Emergency Operations Plans and recommends specific roles and responsibilities for school district-level administrators and staff. <https://bit.ly/3v73F7V>

Cybersecurity and Infrastructure Security Agency (CISA): School Security Assessment Tool (SSAT) <https://bit.ly/3Tz0RJX>

Office of Elementary and Secondary Education School Emergency Response to Violence (Project SERV)

Under the Project SERV grant, provides short-term support after a traumatic event to affected LEAs or institutions of higher education. These grants are intended to provide a limited amount of funds to meet acute needs and restore the learning environment. At the discretion of the Secretary, funding amounts and project periods may be established (subject to the availability of appropriations) to reflect the scope of the incident and potential recovery needs. <https://bit.ly/4cgZln0>

CSBA's Golden Bell Award winners for school culture and safety

Programs that effectively prevent or reduce school violence by promoting a safe, positive school climate and by teaching students to resolve conflicts. These may also include other prevention or intervention strategies such as programs that promote school safety using planning, monitoring, and assessment tools; programs that support students' sense of belonging and engagement in order

to increase motivation and achievement; and successful efforts to reduce school suspensions and expulsions.

Golden Bell Awards 2022 (csba.org) <https://bit.ly/43eaX6l>

Golden Bell Awards 2021 (csba.org) <https://bit.ly/3lzqS5N>

Golden Bell Awards 2020 (csba.org) <https://bit.ly/3Ve9HOv>

Relevant CSBA board policies and administrative regulations

CSBA GAMUT Policy and Policy *Plus* subscribers have access to sample policies. The following are sample policies and administrative regulations that are relevant to comprehensive school safety plans.

- ▶ BP 0000 - Vision
- ▶ BP 0100 - Philosophy
- ▶ BP 0200 - Goals for the District
- ▶ BP 0400 - Comprehensive Plans
- ▶ BP/AR 0450 - Comprehensive Safety Plan
- ▶ BP/AR 1250 - Visitors/Outsiders
- ▶ BP/AR 3514 - Environmental Safety
- ▶ BP/AR 3515 - Campus Security
- ▶ BP/AR 3515.2 - Disruptions
- ▶ BP/AR 3515.3 - District Police/Security Department
- ▶ BP/AR 3516 - Emergency and Disaster Preparedness
- ▶ BP 4131 - Staff Development
- ▶ BP/AR 4158 - Employee Security
- ▶ BP 4231 - Staff Development
- ▶ BP/AR 4258 - Employee Security
- ▶ BP 4331 - Staff Development
- ▶ BP/AR 4358 - Employee Security
- ▶ BP 5112.5 - Open/Closed Campus
- ▶ BP/AR 5131.7 - Weapons and Dangerous Instruments
- ▶ BP/AR 5136 - Gangs
- ▶ BP 5137 - Positive School Climate
- ▶ BP/AR 5141 - Health Care and Emergencies
- ▶ BP/AR 5142 - Safety
- ▶ BP 5145.11 - Questioning and Apprehension by Law Enforcement
- ▶ BP/AR 5145.12 - Search and Seizure

Endnotes

- 1 California Department of Education (2023, June 14). *Safe Schools Planning*. Retrieved July 27, 2023, from <https://bit.ly/3lBviZN>.
- 2 California Department of Education (2022, August 19). *Comprehensive School Safety Plans*. Retrieved July 27, 2023, from <https://bit.ly/3TaMxWK>.
- 3 A.B. 1747— California State Legislature (2017-2018) School Safety Plans. (2018, September 27). <https://bit.ly/3T8KN00>.
- 4 Cal OES Governor's Office of Emergency Services. (2023). *CALIFORNIA EMERGENCY MANAGEMENT FOR SCHOOLS: A Guide for Districts and Sites*. Retrieved from <https://bit.ly/3TKnZFL>.
- 5 See Endnote 2.
- 6 Earthquake Country Alliance (n.d.). *GET READY TO SHAKEOUT!* The Great California Shake Out. Retrieved July 28, 2023, from <https://bit.ly/3Tf0jYr>.
- 7 See Endnote 2.
- 8 Readiness and Emergency Management for Schools REMS Technical Assistance Center (2022, September 27). Retrieved from <https://bit.ly/3lxDDOe>.
- 9 See Endnote 6.

John Czajkowski is the Director of Safety and Security for Sweetwater Union High School District.

