



REQUIREMENTS FOR MANDATORY SCHOOL DRILLS

The Texas State Teachers Association offers the following comments to Proposed Amendment to 19 TAC Chapter 103, Health and Safety, Subchapter CC, Commissioner's Rules Concerning Safe Schools, §103.1209, Mandatory School Drills

Senate Bill 168, authored by Senator Blanco and signed into law June 14, 2021, requires school districts to adopt trauma-informed methods and policies regarding active shooter drills and exercises. The Texas State Teachers Association supported this legislation as an excellent first step to providing the needed guardrails for mandatory school drills in a way that centers the mental health and well-being of children. To implement the legislation according to the author's full intent, it is imperative that rulemaking reinforce student protections against trauma-inducing events such as active shooter simulations.

The law permits schools systems to conduct active threat exercises, which could include an active shooter simulation or a live simulation that mimics or appears to be an actual shooting incident. While in certain scenarios it may be in the best interest of adult preparedness to afford districts the option to conduct such exercises, **the law fails to ensure that students do not participate in active threat exercises that include simulations that mimic the scene of a shooting.** According to best practice recommendations put forth by trauma experts such as those suggested by the National Association of School Psychologists, exposing children to simulated shootings will negatively impact participants' mental health.¹ Experts tell us that simulations are fear-inducing and will cause anxiety because students are often unable to tell that a simulation is not a real threat.

Fortunately, rulemaking can resolve this issue. The law tasks the Commissioner of Education, in consultation with the Texas School Safety Center and the state fire marshal, with defining relevant terms and identifying best practices, such as the ones suggested by mental health experts. 19 TAC §103.1209 should therefore include clarifying language that would better distinguish between active threat exercises intended for an adult audience and school safety drills designed for children and that prioritize student wellness. As drafted, the proposed amendment fails to make this critical distinction.

TSTA proposes two straightforward additions that we believe will better protect students and implement the new law according to its intent.

1. Proposed language should explicitly define "active threat exercises" as safety response actions that do not involve student participation in active shooter simulations.
2. Proposed language should name the best-practice components of school safety drills and exercises.

¹ <https://www.nasponline.org/resources-and-publications/resources-and-podcasts/school-safety-and-crisis/systems-level-prevention/best-practice-considerations-for-armed-assailant-drills-in-schools>

ACTIVE THREAT EXERCISE DEFINITION

TSTA proposes that an “active threat exercise” be defined as follows:

*A response action schools take with a primary objective of preparing staff, students and visitors for an active threat in or around the school. Active threat exercises must be trauma-informed, evidence-based, developmentally and age-appropriate **and must not involve student participation in active shooter simulations or in live simulations that mimic or appear to be an actual shooting incident. Active threat exercise simulations must not occur when students are on campus.***

BEST PRACTICE COMPONENTS

Best practices for conducting emergency school drills and exercises must embody approaches to student and staff wellness and safety that are developmentally and age-appropriate, trauma-informed and evidence-based. When implementing active shooter drills and exercises, schools should be required to:

- involve school-based mental health professionals prior, during and after completion of drills and exercises.
- designate a reasonable amount of time following a drill or exercise to allow for postvention services to mitigate negative mental health impacts on students and staff.
- track data on the efficacy and impact of drills and exercises, which should be reviewed annually and used to inform and update future content.

Educators’ number one priority is ensuring student safety and well-being, and TSTA continues to advocate for a multi-pronged approach to keeping schools and students safe. This includes providing a safe and secure learning environment for all students, increasing access to mental health services, and taking meaningful action on gun violence prevention. TSTA supports readying school systems for unanticipated emergencies through safety exercises and drills, but it is critical that our efforts center the mental health and well-being of children. To do this, rule text must explicitly prohibit student participation in active shooter simulations and name best-practice components recommended by school mental health professionals. Without very intentional language in rule, many Texas students will be at risk of being traumatized by the very professionals charged with their care.