LEGISLATIVE BUDGET AND FINANCE COMMITTEE

A JOINT COMMITTEE OF THE PENNSYLVANIA GENERAL ASSEMBLY

A Study Pursuant to Senate Resolution 178: A Review of Act 44 School Safety Initiatives

March 2025

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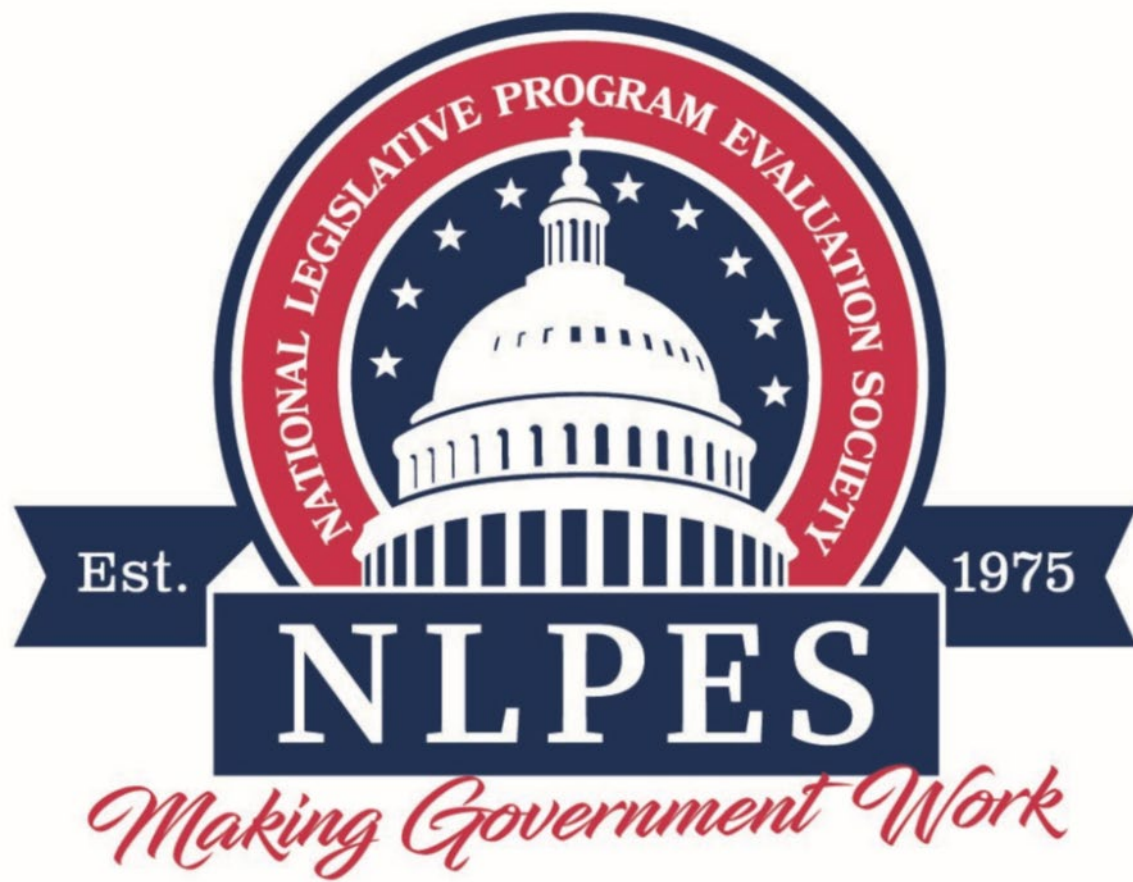
For the ninth straight year, the National Legislative Program Evaluation Society (NLPES) awarded the Legislative Budget and Finance Committee with a Certificate of Impact. NLPES presents the Certificate of Impact to legislative offices that produce evaluations or audit reports that result in documented public policy changes, program improvements, dollar savings, or other public impacts.

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REPORT SUMMARY

Overview

A safe environment is paramount to the physical, emotional, and intellectual well-being of Pennsylvania's youth. Modern school safety encompasses far more than physical deterrents and security protocols; it includes all systems, behaviors, and resources--including legislation-- needed to produce a positive learning environment.

Senate Resolution 178 (SR 178) of 2023 tasked the Legislative Budget and Finance Committee (LBFC) with conducting a comprehensive study of policy initiatives created under Act 44 of 2018 (Act 44). By way of background information, Act 44 was a milestone piece of legislation that created several new school safety initiatives in Pennsylvania, including, but not limited to, the School Safety and Security Committee (SSSC), School Safety and Security Grant Program, and the Safe2Say Something (S2SS) Program.

The Pennsylvania Senate unanimously adopted SR 178 on November 15, 2023. On December 12, 2023, the LBFC Officers adopted SR 178 as a staff project. Our study objectives are detailed in the text box to the left.

Our report is organized as follows:

Section I	–	**Objectives, Scope, and Methodology**
Section II	–	**Background Information about Act 44 of 2018 and School Safety**
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Section IV	–	**Security Assessments**
Section V	–	**School Climate Monitoring and Reporting**
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Staff from the Pennsylvania Commission on Crime and Delinquency (PCCD), which provides administrative support to the SSSC, have reviewed a draft of this study, and their comments are included at the end of the report. In the following pages (S-1 through S-10), we summarize our findings and recommendations from Sections III, IV, V, and VI.

Finally, it is imperative to recognize the intricate nature of studying school safety issues comprehensively. While our primary focus was on the initiatives outlined in Act 44, school safety is a multifaceted topic that

extends well beyond this specific legislation. In fact, since Act 44's enactment, eight additional pieces of legislation have passed, each of which plays a role in shaping school safety. Given the complexity of this topic, each initiative associated with Act 44 could potentially serve as the basis for an individual, in-depth study. Our work, therefore, adopted a macro perspective to provide a holistic understanding of each initiative's complexities and any challenges.

Section III
Update on Act 44 Initiatives

Act 44 is foundational legislation for much of today's school safety and security architecture operational in the commonwealth. Notably, the legislation established the Pennsylvania School Safety and Security Committee (SSSC), which is responsible for guiding and overseeing a wide range of school safety and security initiatives and issues impacting school entities. Comprised of executive branch officials, members of the General Assembly, and selected subject-matter experts from across the state, the SSSC is housed within the Pennsylvania Commission on Crime and Delinquency (PCCD). As a result, many of SSSC's efforts are carried out by PCCD staff.

A key responsibility of the SSSC is administering the School Safety and Security Grant Program. While the funding distribution model for the grant program has experienced multiple iterations since the passage of Act 44, over $600 million in awards have been successfully disbursed to school entities since 2018.

Spurred at least partly by the COVID-19 pandemic, school entity participation in the grant program has increased significantly in recent years. Whereas 539 school entities applied for grant funding in the months immediately following Act 44's passage, the SSSC now consistently receives applications from over 730 school entities each grant cycle. At its peak, the SSSC received applications from 774 school entities during the 2020-21 funding cycle, an increase of 44 percent from the first year of the grant program.

Of the allowable uses for grant funding outlined in Section 1306-B(j) of the Public School Code, we found that security planning, purchasing of security-related technology, and security-related technology training was
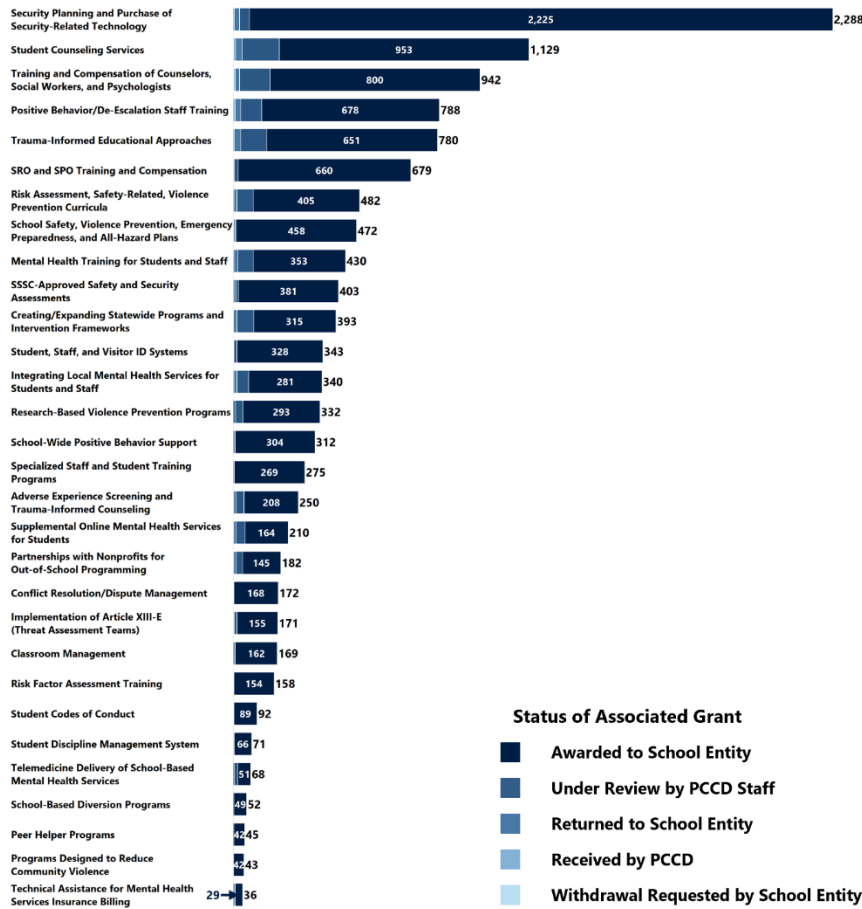
Figure 1: Number of Grant Activities Proposed by School Entities.

the single most frequently requested grant activity, included in 19 percent of grant proposals across all non-COVID-impacted years.[1] However, on aggregate, we found that activities pertaining to behavioral health constituted 54 percent of all grant use since 2018. This trend is most likely due to an influx of over $180 million in funding for behavioral health services since Act 55 of 2022 specifically carved out school mental health grants within the School Safety and Security Grant Program. Since 2022, two-thirds of all proposed activities from school entity grant applications have pertained to mental or behavioral health.

Another core function of the SSSC was the development of physical security and behavioral health standards, known as "baseline criteria," for school entities. Originally released in 2021, the baseline criteria standards outline building design, training, and emergency preparedness requirements for school entities, among other recommended school safety practices. The baseline criteria, which were updated in 2023, currently provide three "levels" of gradient standards that school entities can meet regarding safety and security, ranging from fundamental protocols on Level 1 to the most advanced practices and policies on Level 3. We also reviewed how Pennsylvania's baseline criteria compared to standards promulgated by the United States Department of Justice and other leading states. While policies and practices can vary by jurisdiction, we found that the strategies employed in the commonwealth are in line with those used in other portions of the country.

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[1] Rather than the specific purposes for grant funding established under Act 44, Act 30 of 2020 designated targeted pandemic response uses for School Safety and Security Grant Program awards during the 2020-21 school year.

Section IV
Security Assessments

To address safety concerns most effectively, school entities must first understand their needs. Act 44 addressed this requirement by outlining a process by which safety and security assessments are to be conducted in the commonwealth. The SSSC developed assessment criteria across three domains:

- **Physical Assessment:** An assessment conducted to evaluate a school's facilities and surrounding property, in addition to a review of the school's existing safety and security plan, crisis response and mitigation plan, crime prevention policy, and discussions with local law enforcement and school personnel.

- **Policy and Training Assessment:** An evaluation of the school's policies and practices, such as student safety and security, student code of conduct, safety and security training and policies, and communication practices.

- **Student Assistance and Behavioral Health Support Assessment:** This assessment evaluates the school's climate, availability of student assistance programs, and the professionals administering the services students need.

The SSSC adopted the first iteration of school safety and security assessment criteria in 2018. Covering 11 areas of a school entity's physical security, behavioral health and climate, and training environment, the assessment criteria were later reviewed and revised in February 2021. Under the parameters set forth by Act 44, the criteria must be reviewed every three years. However, we were informed that the SSSC is currently overdue on this statutory requirement, which was to be completed by February 2024.

Figure 2: School Safety and Security Assessment Criteria Areas (Feb. 2021).

While the assessment criteria are designed to support school entities in performing self-assessments, Act 44 designates two formal means by which schools may have assessments completed.
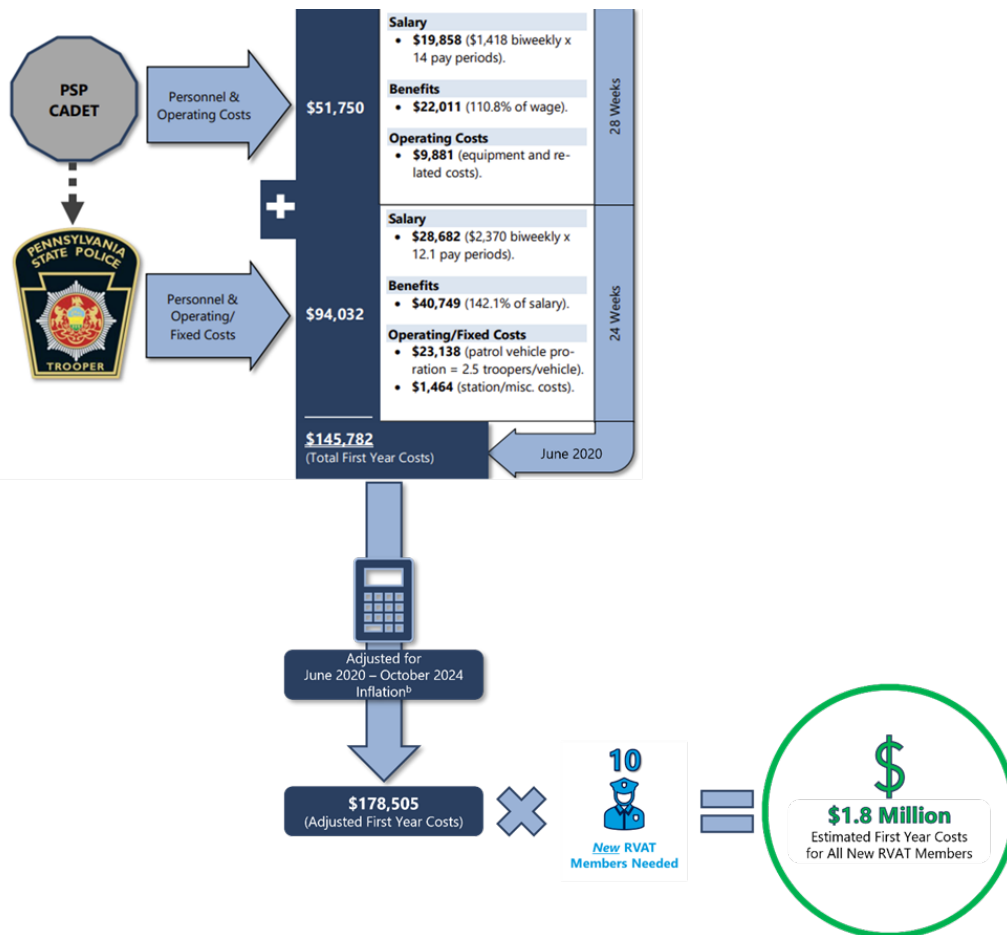
Figure 3: Estimated Costs to Supplement PSP Troopers to RVAT Unit.

School entities that qualify based on a ratio of market value to income aid ratio may request a physical security assessment to be conducted by the Pennsylvania State Police (PSP) through its Risk and Vulnerability Assessment Team (RVAT). Conducted at PSP's expense, RVAT members possess specialized training suited for security assessments of schools, critical infrastructure sites, houses of worship, and other public buildings. Since 2018, RVAT's 18-member unit of specialized troopers has assessed 1,991 entities, 69 percent of which were public or private K-12 schools. However, because the RVAT unit is in high demand, these assessments have a considerable backlog. While the backlog approached 600 during the COVID-19 pandemic, as of the end of the 2023-24 fiscal year, RVAT reported 533 total assessments pending at K-12 school buildings. Based on our analysis of the 2024 Commissioner's Report, we estimate that PSP would require an additional ten RVAT members to completely address the backlog as of the end of 2023-24. Citing analysis from our 2020 study on the PSP complement, we conservatively estimate that allocating an additional ten troopers for RVAT would cost the PSP $1.8 million.

For those school entities that do not qualify to receive priority status for RVAT assessments, Act 44 also tasked the SSSC with creating criteria for private school safety and security assessment providers, who can conduct physical security and/or behavioral health assessments. These providers are available for school entities to contact on the public School Safety and Security Provider Registry. While PCCD maintains this online regis-

try, collecting additional information from providers, including the number of assessments performed by each provider, is not required. Therefore, we worked with PCCD to conduct a brief, controlled survey of providers, many of whom – 87 percent of respondents – reported satisfaction with the current assessment criteria.

The priority placed on assessments has greatly enhanced the understanding of the safety and security landscape for Pennsylvania's schools. In its most recent survey of school entities during the 2022-23 academic year, PCCD reports that 91 percent of responding schools had completed a physical security assessment, while 51 percent had submitted a behavioral assessment in the last three years.

Section V
School Climate Monitoring and Reporting

This section focuses on the multiple programs, policies, and tools Act 44 instituted to enhance the daily monitoring and reporting of school climate issues. In particular, we reviewed the Safe2Say Something (S2SS) program within the Pennsylvania Office of Attorney General (OAG). This program is an anonymous reporting tip line to report suspicious activities or concerns. Tips can be submitted via several communication methods (phone, text, web, or app), all of which are received by the S2SS crisis center in Harrisburg and forwarded to school entities as necessary. According to the program's annual reports, nearly 148,000 tips have been received by S2SS since 2018. Unfortunately, we were prevented from reviewing more specific data on the S2SS program because of confidentiality limitations in the law. This prohibition prevented us from reviewing tip dispositions, specifically the timeliness and specificity by which school entities resolved tips. We believe this area requires further research and review, and we recommend statutory changes, advanced training for specific staff, and periodic performance reviews on a five-year basis. As detailed in the report section, five other states have implemented similar safeguards. Experts from the University of Michigan who study anonymous tip line effectiveness agree with this conclusion.

Act 44 formalized training and educational requirements for school police officers (SPOs), school resource officers (SROs), and school security guards (SSGs), setting the groundwork for the umbrella term "school security personnel." According to the National Center for Education Statistics, in the 2019-20 school year, approximately 65 percent of all public schools had at least one security personnel within the school at least once a week. Act 55 of 2024 recently required that all school districts staff at least one full-time, fully trained school security person beginning with the 2024-25 school year. Hearing from school districts about this mandate's potential challenges, we reviewed open-source data from the

Pennsylvania Department of Education (PDE). We found that 440 school entities--and more specifically to the requirement contained in Act 55 of 2024--226 school districts reported employing no security personnel as of the 2023-24 school year, potentially creating an influx of exception waivers to be filed with the SSSC.

Act 44 also required that each school entity designate an administrator as its "school safety and security coordinator," who is responsible for all of the district's security personnel and ensuring that the district's policies and procedures comply with state law. In this role, the coordinator organizes student and staff safety training, reports on security procedures and personnel, and is the school's liaison with law enforcement and other public safety officials. The school safety and security coordinator is a critical position within school safety. However, we fielded concerns from multiple stakeholders over the lack of certification requirements currently in place for the position, an area which is further explored in Section VI.

We conclude this section by reviewing annual school district "incident data" maintained by PDE. This self-reported safety and security measure can provide insight into Pennsylvania's current school climate. As expected,
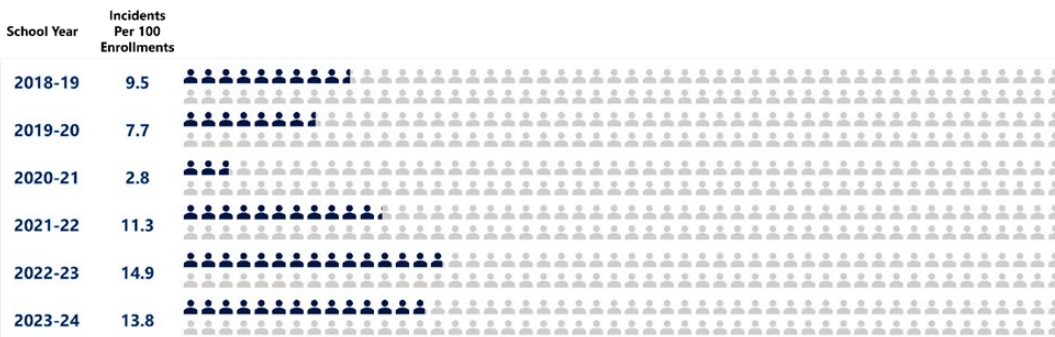
Figure 4: Average Incident-per-100 Enrollments by School Year (Statewide).

we found that the statewide average of incidents per 100 school enrollments experienced a dramatic decline during the COVID-19 pandemic. However, whereas the rate of incidents was declining pre-COVID, the number of incidents per 100 enrollments is significantly higher in the post-pandemic school environment. Incidents per 100 enrollments peaked at 14.9 in 2022-23, a 57 percent increase from 2018-19. We found common incident types reported by school entities included code of conduct violations, fighting, possession/use of a controlled substance, and minor altercations.

Section VI
Options for Future Consideration

In this final report section, we present the results of SR 178's specific objective of analyzing other relevant data on school safety and student mental health (objective two). This report section also consolidates many of the recommendations presented in earlier sections and discusses policy options for further discussion and analysis.

A significant obstacle we found when conducting data analysis to evaluate school safety is that while there is often a wealth of data, the data is also "siloed" and typically collected by one agency for one purpose. For example, incident and S2SS data are collected and handled via PDE and OAG, respectively, while PCCD oversees data on school safety and security grants and the Pennsylvania Youth Survey (PAYS). This condition is not uncommon, but we found examples from two states (Maryland and Tennessee) that are working to remove these barriers by requiring more consolidated annual reporting across multiple data points. As an example of how data could be used to evaluate school climate conditions, we performed a comparative analysis of differing data points related to suicide.   We chose suicides because, in addition to being a high-priority, well-documented issue, suicide is a devasting outcome that touches on aspects of both behavioral health and physical safety/security (e.g., bullying) within schools. We focused on comparing grant uses to the number of suicide incidents (from PDE's incident data), along with the percentage of respondents indicating experiences of suicidal ideation (from PAYS data). This analysis was only a test example; therefore we caution against over-interpretation of a very complex issue, but we did find a trend in our analysis that the number of students indicating suicide ideation in PAYS declined when there was an increase in behavioral health grant uses, especially following the COVID-19 pandemic.

Finally, regarding options for future consideration, we discuss several of the recommendations made in earlier report sections in further detail. To that end, all of our proposed recommendations are listed here with the applicable report section and corresponding page numbers. We believe these sixteen recommendations are a starting point for further discussion, policy analysis, and evaluation.

Overall Report Recommendations

1. The PSP should increase the number of troopers assigned to RVAT or include non-PSP or civilian members to assist with the assessment process [See Section IV – pg. 81].

2. The SSSC should prioritize the periodic review of its school safety and security assessment criteria to bring the materials in line with the statutory requirements of the Public School Code [See Section IV – pg. 85].

3. The General Assembly should consider amending section 1305-B of the Public School Code to require school entities to submit copies of their pre-existing assessments to PCCD with any future iterations of the preparedness survey [See Section IV- pg. 87].

4. The General Assembly should consider amending section 1304-B of the Public School Code to require the SSSC to review the School Safety and Security Provider Registry at least every three years and make updates as needed [See Section IV – pg. 92].

5. The SSSC should require providers to report the number of assessments completed by type (physical assessments, student assistance, behavioral health, and school climate assessments) annually. [See Section IV – pg. 92].

6. PCCD should integrate information about the number of assessments completed by providers (as suggested above) into the registry so that school entities can better identify those more experienced professionals [See Section IV – pg. 92].

7. The General Assembly should consider amending section 1303-D of the Public School Code of 1949 as amended to require school entities to resolve all S2SS tips within 30 days of receipt by the school entities [See Section V – pg. 110].

8. OAG should provide School Safety and Security Coordinators with advanced training on proper tip disposition procedures so that tips are tracked and resolved according to best practices established by OAG [See Section V – pg. 110].

9. The General Assembly should consider amending section 1309-B of the Public School Code to require School Safety and Security Coordinators to provide annual attestations to the OAG that S2SS disposition information is accurate [See Section V – pg. 110].

10. The General Assembly should consider amending section 1304-D of the Public School Code to allow aggregated and redacted data sharing with the Legislative Budget and Finance Committee so that performance audits on tip dispositions can be conducted every five years. These audits will help ensure that school entities are adhering to established procedures [See Section V – pg. 110].

11. The General Assembly should consider amending the Public School Code to create a school safety and security coordinator certification similar to other nationally recognized professional accreditation processes [See Section V – pg. 116 and Section VI – pg. 140].

12. The SSSC should establish a set of performance metric criteria encompassing multiple information points related to school safety and security [See Section VI – pg. 134].

13. The SSSC should develop an annual report on school safety and security using the consolidation of all school safety and security data, including grant data [See Section VI – pg. 134].

14. PCCD should further expand school safety organizationally and create an "Office for School Safety" [See Section VI – pg. 137].

15. The SSSC should establish a youth/student advisory board within the SSSC [See Section VI – pg. 137]

16. The General Assembly should consider passing a requirement for panic button notification systems. We also recommend that these panic notification systems be implemented in a phased approach and with funding assistance [See Section VI – pg. 143].

SECTION I
OBJECTIVES, SCOPE, AND METHODOLOGY

Why we conducted this study…

The Pennsylvania Senate adopted Senate Resolution (SR) 178 on November 15, 2023. On December 12, 2023, the Officers of the Legislative Budget and Finance Committee (LBFC) voted unanimously to adopt SR 178 as a staff project. SR 178 tasks the Legislative Budget and Finance Committee (LBFC) with conducting a comprehensive study of school safety initiatives created by Act 44 of 2018.

Introduction

The Pennsylvania Senate adopted Senate Resolution (SR) 178 on November 15, 2023 (see Appendix A). SR178 tasked the Legislative Budget and Finance Committee (LBFC) with conducting a comprehensive study of policy initiatives created under Act 44 of 2018 (Act 44). Act 44 provided for new school safety initiatives, including but not limited to, the School Safety and Security Grant Program, the Safe2Say Something program, and formed the School Safety and Security Committee within the Pennsylvania Commission on Crime and Delinquency (PCCD).

Objectives

After the House or Senate adopts a resolution, as a matter of practice the LBFC's Officers also adopt objectives for the proposed study. Study objectives allow us to answer the requirements of the resolution more precisely and provide an outline from which to plan the various study phases. In response to SR 178, on December 12, 2023, the LBFC Officers adopted the objectives that follow:

1. To provide a performance audit of the primary school safety initiatives created by Act 44 of 2018.

2. To provide a contextual analysis of specific outcome measures related to school safety, including but not limited to analysis of the Pennsylvania Youth Survey and data on school discipline.

3. To review best practices in school safety, including the baseline criteria standards used to measure school district's physical security and mental health needs, and the standards for security personnel authorized under the Public School Code of 1949.

Scope

According to Government Auditing Standards, issued by the Comptroller General of the United States through the Government Accountability Office (GAO), scope refers to the boundary of a study, and is directly tied to the audit objectives.[2] The scope of our study was primarily the period June 30, 2018, through June 30, 2024. In some areas, which are noted in the report, we either preceded or went beyond this timeframe.

Methodology

We worked closely with the Pennsylvania Commission on Crime and Delinquency (PCCD) and the School Safety and Security Committee (SSSC) to understand the various school safety initiatives mandated by Act 44. Our research included examining similar organizational structures in other states, specifically Wisconsin, Ohio, Florida, Maryland, and Virginia.

To understand the School Safety and Security Grant Program's funding and grant distribution process, we analyzed state budget documents and interviewed PCCD staff. We also reviewed grant distribution data, including meritorious and competitive awards, against the average student population, as provided by the Pennsylvania Department of Education (PDE).

Using award data provided by PCCD, we reviewed the eligible activities outlined in Section 1306-B(j) of the Public School Code of 1949. Then, we organized the eligible funding uses by the status of their associated grants.

We examined the SSSC's baseline criteria standards for physical security and behavioral health. We compared Pennsylvania's baseline criteria with federal recommendations from the United States Department of Justice School Safety Working Group's Office of Community-Oriented Policing Services (COPS).

We analyzed baseline criteria standards and grant distribution in Georgia, Texas, Florida, Ohio, and Virginia to assess how Pennsylvania's baseline criteria and grant distribution processes compare to other states.

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[2] *See* Comptroller General of the United States, Government Accountability Office, *Government Auditing Standards*, 2018 Revision, paragraph 8.10. Note: 2024 *Government Auditing Standards* revisions are not applicable until December 15, 2025.

Additionally, we worked with the Pennsylvania State Police (PSP) Risk and Vulnerability Assessment Team (RVAT) to comprehend the physical assessment criteria and processes. We compared RVAT criteria to those established by the SSSC. We also analyzed the PSP Commissioner's annual RVAT reports to review the number of physical assessments completed annually and the backlog of assessments that still need to be completed.

To estimate the number of troopers and costs required to address this backlog, we analyzed the number of completed assessments by each RVAT team member during FY 2023-24 and applied that ratio to the backlog. We used a previous LBFC report to calculate the first-year trooper costs and applied a United States Bureau of Labor Statistics' inflation adjustment to calculate a cost estimate.[3]

Furthermore, we reviewed the SSSC's statutory requirement to conduct a school safety and security preparedness survey every two years. We requested access to survey data from each of the three years of administration to assess which school entities had improved, maintained, or regressed in safety preparedness since the passage of Act 44. Unfortunately, confidentiality restrictions prevented the SSSC from sharing raw data; however, they provided aggregated data.

As part of our study, we visited the Safe2Say Something (S2SS) headquarters in Harrisburg. We met with S2SS staff and observed the real-time tip submission process. We also reviewed previous tips to understand the process from beginning to end. We requested access to source documentation on S2SS tips; however, due to a confidentiality provision in Act 44, we were denied access and had to rely on the aggregated data from the public annual reports.

Using school security personnel data from PDE, we applied a regression analysis using the market value/personal income aid ratio (MV/PIAR) to determine if a correlation exists between the number of school security personnel and socioeconomic status.

We researched other states' anonymous tip lines in five other states (Colorado, Michigan, Wisconsin, Ohio, Wyoming) to identify best practices and model statutory language for tip line response requirements. We also spoke with researchers from the University of Michigan who are currently engaged in a federally-funded study that is evaluating the effectiveness of anonymous tip lines using data from other states (not Pennsylvania).

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[3] *A Study on the Statutory Cap on the Pennsylvania State Police. See* https://www.palbfc.gov/Resources/Documents/Reports/659.pdf.

Finally, we obtained PDE's annual incident reports for each local educa-
tion agency (LEA) for the 2018-19 through 2023-24 school years. Using
data from PDE, we calculated incident-to-enrollment ratios and the aver-
age incident-to-enrollment rate for each school entity. In addition, we
used PDE data to calculate the top five reported incident categories.

In Section VI, we conducted a contextual analysis of suicide-related data
to exemplify how consolidated school safety data can be used to visual-
ize overall school safety and security needs. We compiled data from the
(1) Pennsylvania Youth Survey (PAYS)[4] 2019, 2021, and 2023, (2) PDE's
incident data[5] from 2018-19 to 2023-24, and (3) school safety and secu-
rity grant use[6] data from 2018-19 to 2023-24. We computed percentage
changes from year to year. Our analysis excludes percentage changes
from 2018-19 because it would have involved using the 2017-18 data,
which is outside of our audit scope and precedes the year when Act 44
went into effect.

There were some data limitations to our contextual analysis in Section VI.
One of these limitations was that the PAYS data reflects students' percep-
tions of school climate. Therefore, the trends in the PAYS data may not
completely match the trends in the incident data. PAYS inquires students
about school climate issues and actions in various environments (e.g.,
off-campus, on-campus, at home), while the incident data encompasses
incidents reported on school grounds. Additionally, the Philadelphia City
School District and Pittsburgh School District do not participate in PAYS,
so our analysis did not include those students. These two districts are
the largest in Pennsylvania respectfully.

Another limitation we noticed was that PDE's incident data may not fully
capture all school safety and security-related incidents on school
grounds. For example, some incidents may have gone unreported to the
district and subsequently to PDE. Further, an incident may contain one
or more incident categories (e.g., simple assault on a student and
fighting). Our analysis does not account for this distinction.

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[4] We compiled responses to question f4b on PAYS, which reads, "Did you ever seriously consider attempting suicide?"
For the PAYS data, we calculated the percentage of responses indicating the respondent had considered attempting
suicide. Then, we calculated percentage changes from one PAYS to another using these numbers. Note that our
analysis excludes nonpublic, non-licensed schools.
[5] We summed the reported numbers on the incident data for columns "Suicide – Attempted" and "Suicide – Commit-
ted" to determine the total number of suicide incidents for each year.
[6] We specifically focused on grant uses toward eligible behavioral health-related activities listed under Section 1306-
B(j) of the Public School Code of 1949.

Frequently Used Abbreviations and Definitions

This report uses several abbreviations for government-related agencies, terms, and functions. These abbreviations are defined as follows:

Abbreviation	Name	Definition
ACS	Accuracy Certification Statement	A form that a local education agency submits to the Pennsylvania Department of Education with its annual incident data.
ADM	Average Daily Membership	A unit of measurement that divides the aggregate days membership for all children on active rolls by the number of days the school district is in session.
CARES Act	Coronavirus Aid, Relief, and Economic Security Act	A federal legislative package that was enacted in 2020 in response to the COVID-19 outbreak to provide financial assistance to state and local governments, individuals, and businesses.
CDP	Center for Domestic Preparedness	A federal office within the Federal Emergency Management Agency that provides advanced, all-hazards training to emergency responders.
COPS	United States Department of Justice's Office of Community-Oriented Policing Services	A federal office within the United States Department of Justice that focuses on community policing practices.
CTC	Career and Technical Centers	Educational entities in Pennsylvania providing career and technical education.
CVPR	Community Violence Prevention/Reduction	A program/initiative of the School Safety and Security Grant Program that focuses on reducing community violence in Pennsylvania.
EOP	Emergency Operations Plan	A plan that is aimed at preventing emergencies and disasters.
ESSER Fund	Elementary and Secondary School Emergency Relief Fund	A funding source established through the federal CARES Act, and it provided emergency relief funds to school districts to address the impact of COVID-19.
FLDOE	Florida Department of Education	A state agency that oversees Florida's education system.
FLETC	Federal Law Enforcement Training Center	A federal office that provides law enforcement training services.
GADOE	Georgia Department of Education	A state agency that oversees Georgia's education system.
IU	Intermediate Units	A set of regional educational service agencies in Pennsylvania.

LEA	Local Education Agency	A board of education or other legally constituted local school authority in Pennsylvania with administrative control and direction of public elementary or secondary schools.
MCSS	Maryland Center for School Safety	A state school safety office that provides school safety grants, training, and support to school entities in Maryland.
OAG	Pennsylvania Office of Attorney General	The Attorney General serves as Pennsylvania's chief law enforcement officer.
OHOAG	Ohio Attorney General's Office	Ohio's chief law officer.
OSSC	Ohio School Safety Center	A state school safety office that is housed within the Ohio Department of Public Safety.
PCCD	Pennsylvania Commission on Crime and Delinquency	An agency focused on supporting the criminal and juvenile justice systems, victim services, and community safety in Pennsylvania.
PDE	Pennsylvania Department of Education	The Department oversees Pennsylvania's education system and schools.
PSP	Pennsylvania State Police	The State Police provides law enforcement and public safety services to the residents of and visitors to Pennsylvania.
RVAT	Risk and Vulnerability Assessment Team	A team/unit of Pennsylvania State Troopers who provide physical security assessments for a wide range of facilities in Pennsylvania, including schools and universities.
S2SS	Safe2Say Something	A statewide anonymous tipline program in Pennsylvania that operates under the Pennsylvania Office of Attorney General.
SAP	Student Assistance Program	A program in Pennsylvania that focuses on identifying issues that pose a barrier to a student's success, including alcohol, tobacco, other drugs, and mental health issues.
SLFRF	Coronavirus State and Local Recovery Funds	A funding source from the federal American Rescue Plan Act to assist state, local, territorial, and tribal governments in responding to and recovering from the COVID-19 pandemic.
SPO	School Police Officer	A law enforcement officer employed by a school entity or nonpublic school in Pennsylvania whose responsibilities are determined by the said school entity or nonpublic school. It can also be an independent contractor or an individual provided through a third-party vendor who has been appointed to a school entity or nonpublic school by a county judge.
SRO	School Resource Officer	A law enforcement officer commissioned and employed by a law enforcement agency whose duty station is located in a school entity or nonpublic

		school in Pennsylvania. Their stationing is established via an agreement between the law enforcement agency and the school entity or nonpublic school.
SSG	School Security Guard	An individual employed by a school entity, nonpublic school, or a third-party vendor, or an independent contractor who is assigned to a school for routine safety and security duties. This individual does not carry the responsibilities that a school police officer has.
SSSC	School Safety and Security Committee	A Committee that was established within PCCD in 2018 pursuant to Act 44. SSSC administers various school safety and security practices and grants in Pennsylvania.
SSSF	School Safety and Security Fund	A fund that administers Pennsylvania's School Safety and Security Grant Program.
TEA	Texas Education Agency	A state agency that oversees Texas' primary and secondary public education system.
TSSC	Texas School Safety Center	An official university-level research center at Texas State University that supports Texas' school safety and security work.
VADOE	Virginia Department of Education	A state agency that oversees Virginia's education system.
VDCJS	Virginia Department of Criminal Justice Services	A state agency that oversees Virginia's criminal justice system. It also houses the Virginia Center for School and Campus Safety, which is involved in administering the state's school/campus safety and security initiatives.
WIOSS	Wisconsin Department of Justice's Office of School Safety	An office within the Wisconsin Department of Justice that administers Wisconsin's school safety initiatives (e.g., grants, tipline).

Acknowledgments

Important Note

This report was developed by the Legislative Budget and Finance Committee staff, including Deputy Executive Director Stephen Fickes, who served as project manager, and Matthew Thomas, Amy Hockenberry, and Anthony Choi who were analysts assigned to the project. Anne Witkonis, project manager, also assisted with the project. The release of this report should not be construed as an indication that the LBFC as a whole, or its individual members, necessarily concur with the report's findings, conclusions, or recommendations.

Any questions or comments regarding the contents of this report should be directed to the following:

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SECTION II
BACKGROUND INFORMATION ABOUT
ACT 44 OF 2018 AND SCHOOL SAFETY
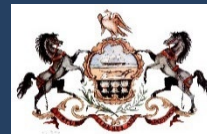
Fast Facts...

❖ *Act 44 of 2018 mandated specific school safety-related responsibilities to several state agencies including: the Pennsylvania Commission on Crime and Delinquency, the Pennsylvania Department of Education, the Office of Attorney General, and the Pennsylvania State Police.*

❖ *Act 44 created new funding streams for school safety initiatives, as well as added responsibilities to local education agencies.*

❖ *Since its enactment, at least eight additional pieces of legislation have impacted Act 44.*

Introduction

Pennsylvania's noted founding father, Benjamin Franklin, said, "An investment in knowledge pays the best interest." Few would disagree that education provides a pathway to future success. To that end, creating safe and secure schools is paramount to ensuring successful educational outcomes for students. With the enactment of Act 44 of 2018 (Act 44), Pennsylvania made a significant advancement and investment in how it approached school safety. This report reviews those Act 44-related initiatives and other relevant amendments to the Pennsylvania Public School Code of 1949 (Public School Code). The following background provides context for the discussions and analysis in subsequent report sections.

Overview of Act 44

Although school safety and security initiatives existed before its passage, Act 44 of 2018 introduced a reorganization with new tools to further school safety. Act 44 began as Senate Bill 1142 in the 2017-2018 legislative session. The bill passed the Senate and House with large bipartisan support and was signed into law on June 22, 2018. The bill amended the commonwealth's educational statutes by adding Article XIII-B (School Safety and Security), Article XIII-C (School Police Officers and School Resources Officers),[7] and Article XIII-D (Safe2Say Something program)[8] to the Public School Code.

As listed in Exhibit 1, Act 44 primarily involves four state agencies: the Pennsylvania Commission on Crime and Delinquency (PCCD), the Pennsylvania Department of Education, the Pennsylvania State Police (PSP), and the Pennsylvania Attorney General's Office (OAG). Each of these agencies and their significance to Act 44 are outlined below.

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[7] As detailed later in this section, Act 67 of 2019 amended the name of Article XIII-C to become "School Security," among other legislative changes.

[8] Article XIII-D defines the anonymous tip line as the "Safe2Say program." However, OAG formally refers to the program as "Safe2Say Something." For consistency, we denote the program as Safe2Say Something (S2SS) throughout this report.

Exhibit 1

Act 44 State Agency Involvement

PCCD	PDE	PSP	OAG
• School Safety and Security Committee • School Security Grants	• Data collection: discipline, incidents, school security personnel	• Risk and Vulnerability Assessment Teams	• Safe2Say Something

Source: Developed by LBFC staff from information obtained from Act 44.

Pennsylvania Commission on Crime and Delinquency (PCCD)

Created in 1978, PCCD is the commonwealth's primary justice planning and policymaking agency. PCCD employs experts in criminal justice, victim services, and other related fields to examine criminal justice problems, propose solutions, and examine the impacts of those solutions. PCCD's general government operations line item was $24.4 million for fiscal year (FY) 2024-25.[9]

PCCD maintains seven advisory committees as follows:

- Children's Advocacy Center Advisory Committee (CACAC),
- County Adult Probation and Parole Advisory Committee (CAPPAC),
- Criminal Justice Advisory Committee (CJAC),
- Indigent Defense Advisory Committee (IDAC),
- Juvenile Justice and Delinquency Prevention Committee (JJDPC),
- Mental Health and Justice Advisory Committee (MHJAC), and
- Victims' Services Advisory Committee (VSAC).

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[9] Throughout this report we use the term "fiscal year" to mean Pennsylvania's fiscal year, which runs July 1 through June 30. Fiscal year may also be used as "school year;" however, school year can be misleading as it may be used informally to refer to the months when students are in school.

Additionally, PCCD houses the School Safety and Security Committee (SSSC; see below) and three training boards (the Constables' Education and Training Board, the Sheriff and Deputy Education and Training Board, and the Firearm Education and Training Board). Organizationally, PCCD staffs five primary offices as follows:

- Office of Justice Programs,
- Office of Victims' Services,
- Office of Gun Violence
- Office of Research, Evaluation and Strategic Policy Development, and
- Office of Financial Management and Administration.

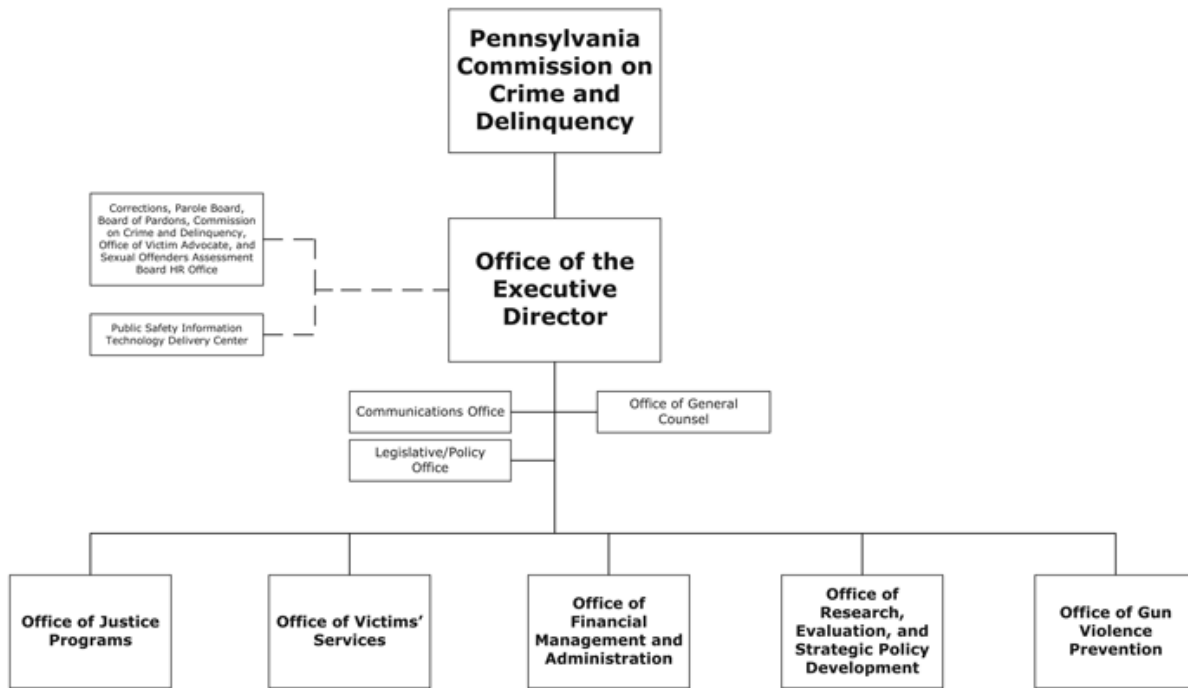Exhibit 2 presents these offices and PCCD's full organizational structure.

Exhibit 2

Pennsylvania Commission on Crime and Delinquency Organizational Chart

Source: 55 Pa.B. 484

School Safety and Security Committee (SSSC). Act 44 of 2018 created the SSSC within PCCD to direct the school safety and security grants program and establish baseline school safety standards (see Section III of this report for further information on the SSSC's role in the school safety and security grant program).

The SSSC consists of 22 members filled through statutory designations, legislative and gubernatorial appointments, and one joint legislative and gubernatorial appointment of a strategic security subject matter expert. As of August 2024, 21 of the 22 SSSC positions were filled by either an appointed member or designee.

Exhibit 3 shows the appointing authority and membership of the SSSC as of August 2024.

Exhibit 3

School Safety and Security Committee Membership

Statutory Designations
1. Secretary of Education or designee
2. Attorney General or designee
3. State Police Commissioner or designee
4. PEMA Director or designee
5. PCCD Chairman or designee (current Chair of the SSSC)
6. Department of Human Services Secretary or designee
Legislative Appointments
7. Appointment by Senate Pro Tempore
8. Appointment by Senate Minority Leader
9. Appointment by Speaker of the House
10. Appointment by House Minority Leader
Legislative/Gubernatorial Appointments
11. A recognized subject matter expert in strategic security appointed by the Governor from three names submitted jointly by the President Pro Tempore of the Senate and the Speaker of the House of Representatives
Gubernatorial Appointments
12. An individual recommended by the Pennsylvania Association of School Business Officials with experience in school safety and security matters appointed by the Governor
13. An individual recommended by the Pennsylvania Association of School Administrators with experience in school safety and security matters
14. An individual member of local law enforcement recommended by the State Fraternal Order of Police
15. A child psychologist who specializes in mental, social and emotional development of children recommended by the Pennsylvania Psychological Association
16. A licensed clinical social worker recommended by the Pennsylvania Society for Clinical Social Work
17. An architect recommended by the American Institute of Architects of Pennsylvania with experience in school building safety and security matters
18. An individual who is a subject matter expert in trauma-informed approaches from a State-related institution of higher education

Exhibit 3 Continued

19. A school principal recommended by the Pennsylvania Principals Association with experience in behavioral health matters
20. A school nurse recommended by the Pennsylvania State Education Association with experience in behavioral health matters
21. A school director recommended by the Pennsylvania School Boards Association with experience in school safety and security matters or behavioral health matters
22. The Homeland Security Director of the Office of Homeland Security

Source: Developed by LBFC staff from information provided by PCCD.

School Safety and Security Fund. Act 44 also established the School Safety and Security Fund (SSSF) within the State Treasury. The SSSF funds the School Safety and Security Grant Program (SSSGP), which awards grants to school entities to supplement safety and security measures.[10]

Initially, the SSSF was funded through $15 million in excess fees, fines, and costs collected by any division of the Unified Judicial System. However, Act 54 of 2022 suspended this deposit in FY 2022-23. Act 22 of 2023 again suspended the deposit for FY 2023-24. Ultimately, Act 1A of 2024 permanently removed this deposit.

Despite the loss in revenue, other appropriation acts in recent years have increased funding to the SSSF, including but not limited to funding from COVID-19 relief funds and the transfer of appropriations from the Department of Education. Funding has also increased to provide support for mental health initiatives. Exhibit 4 provides the SSSF's statement of cash receipts and disbursements for FY 2022-23 (actual) and FY 2023-24 (available).

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[10] The Public School Code of 1949 defines a "school entity" as "any public school, including a charter school or cyber charter school, private school, nonpublic school, intermediate unit, or area career and technical school operating within the commonwealth. Within this report, we also use the term to apply to any entity that has been deemed eligible to receive funding from the School Safety and Security Grant Program.

Exhibit 4

**School Safety and Security Fund
Statement of Cash Receipts and Disbursements**
(\$ Thousands)

	2022-23 Actual	2023-24 Available
Cash Balance, Beginning	\$ 15,541	\$ 189,550
Receipts:		
Transfer from General Fund	\$ 200,000	\$ 70,700
Federal Funds - COVID	5,392	670
COVID-SFR Transfer	-	100,000
Interest	6,799	9,701
Total Receipts	212,191	181,071
Total Funds Available	\$ 227,732	\$ 370,621
Disbursements:		
Commission on Crime and Delinquency	\$ 27,726	\$ 254,375
COVID-SFR School Mental Health Grants	-	90,000
Elementary and Secondary School Emergency Relief (ESSER)	5,456	511
Education:		
School-Based MH Training and Pathways to Certification	-	-
COVID-SFR School-Based MH Training and Pathways to Certification	-	5,000
PHEAA:		
School Mental Health Internship	5,000	-
COVID-SFR School Based Mental Health Internship Grant Program	-	5,000
Total Disbursements	(38,182)	(354,886)
Cash Balance, Ending	\$ 189,550	\$ 15,735

Source: Governor's Executive Budget FY 2024-25.

In FY 2022-23, the SSSF's starting balance was \$227.7 million, including appropriations from the General Fund, Federal COVID-19 relief funds, COVID-SFR transfers, and interest.[11] During FY 2022-23, there was a total of \$38.1 million disbursed as follows: \$27.7 million to PCCD, \$5.5 million to the Elementary and Secondary School Emergency Relief, and \$5 million to The Pennsylvania Higher Education Assistance Agency (PHEAA) for school mental health internship. The Fund's ending balance and starting balance for FY 2023-24 was \$189.6 million. In that subsequent year, disbursements to PCCD significantly increased to \$254 million, as did disbursements for mental health grants. In FY 2023-24, the available ending balance in the SSSF was \$15.7 million.

In addition to the funding allocated to school entities, the Public School Code allows the SSSC to use up to 12.5 percent of the SSSF balance for grants to community groups, municipalities, district attorneys, and higher

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[11] COVID SFR transfers were authorized from the COVID-State Fiscal Recovery (SFR) restricted account from July 1, 2024 through June 30, 2025 per Acts 1A of 2022, 2 of 2022, 10 of 2022, and 33 of 2023.

education institutions for programs that combat and reduce violence in communities.[12]

Pennsylvania Youth Survey (PAYS). Introduced in 1989 and conducted in odd-numbered years, the Pennsylvania Youth Survey (PAYS) surveys public, private, and charter school students in 6th, 8th, 10th, and 12th grades.

Through a series of multiple-choice and scaled questions, the survey obtains students' perspectives on mental health, drugs, alcohol, tobacco, violence, and other health risks. The data collected from the survey assists schools, government agencies, local stakeholders, and community prevention coalitions in identifying prevention and intervention programs that address issues such as mental health, substance abuse, and violence in schools and the community.

The last PAYS survey, conducted during the 2023-24 school year, involved 385 school districts and non-traditional schools in 66 counties. The survey is anonymous and voluntary for students and is free to schools.

Pennsylvania State Police (PSP)

In 1905, Governor Pennypacker signed Senate Bill 278 into law, creating the Pennsylvania State Police (PSP), the first police organization in the United States. The PSP has jurisdiction in all political subdivisions and provides full-time or part-time police services to approximately 67 percent of the commonwealth's municipalities.

Pennsylvania has a statutory "cap" on the number of troopers serving in the PSP's ranks. Act 34 of 2023 increased the statutory complement for the first time in 20 years to 4,410 officers and enlisted members but excluded those assigned to other agencies.[13]   The PSP's budget for FY 2024-25 is $1.2 billion. Exhibit 5 presents the PSP's organizational structure.

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[12] In addition to the list defined in the Public School Code, the SSSC may approve other entities to receive community violence and prevention program grant funding.
[13] This exclusion covers those troopers and enlisted members assigned to the Pennsylvania Turnpike Commission, Delaware River Joint Toll Bridge Commission, Gaming Enforcement, and Liquor Control Enforcement.

Exhibit 5

Pennsylvania State Police Organizational Chart

PENNSYLVANIA STATE POLICE
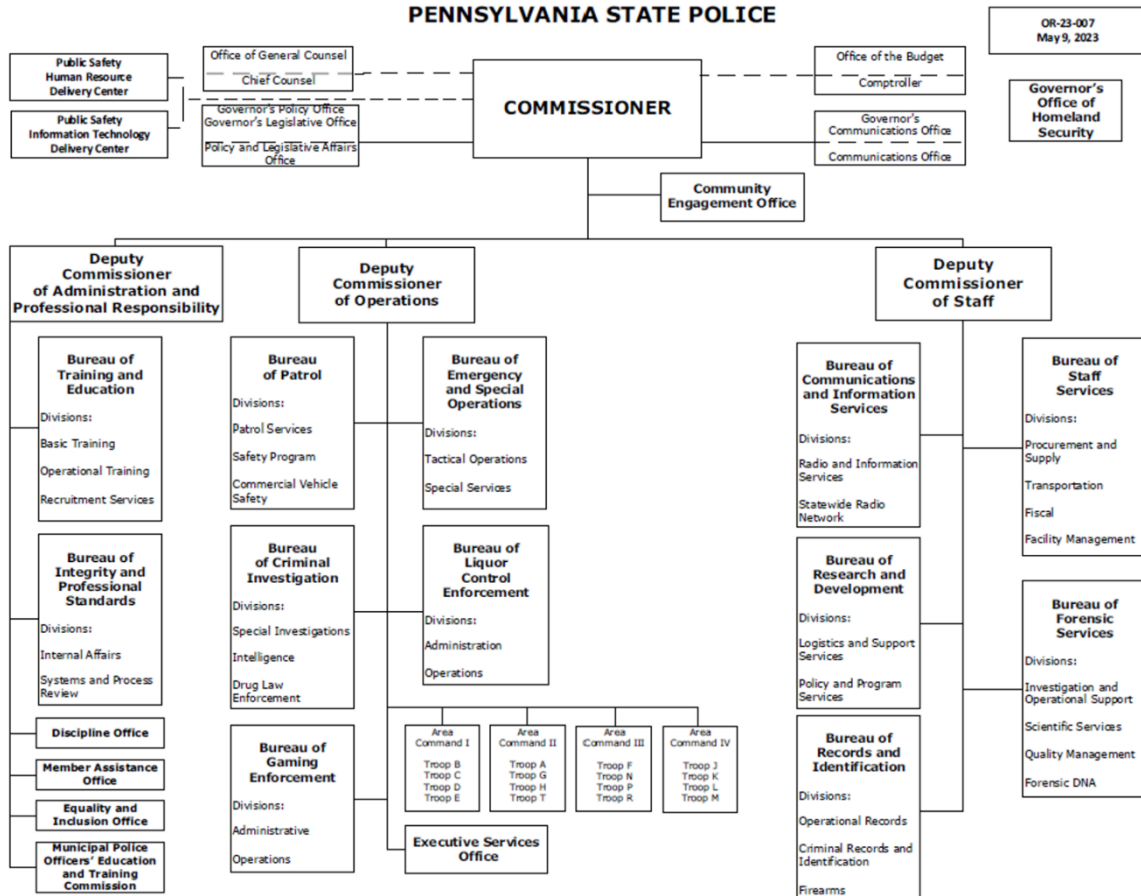
Source: Pennsylvania Office of Administration

The Bureau of Criminal Investigation, Domestic Security Division, directs PSP's Risk and Vulnerability Assessment Teams (RVATs). RVAT personnel are troopers trained in threat analysis, target hardening, explosive effects on structural design, and physical security.[14] RVATs conduct school building physical security assessments free of charge to the school entity. These assessments are available for school entities to review their safety procedures and protocols and identify areas of improvement (See Section IV that follows).

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[14] https://www.education.pa.gov/Schools/safeschools/emergencyplanning/Pages/PAStatePolice.aspx, accessed May 20, 2024. New link can be found at https://www.pa.gov/agencies/education/programs-and-services/schools/safe-schools/school-safety/pa-state-police.html.

Pennsylvania Office of the Attorney General (OAG)

The Office of Attorney General (OAG), created by the General Assembly in 1915, was added to the Administrative Code as the Pennsylvania Department of Justice Administrator in 1923. The OAG is now the top law enforcement office in Pennsylvania. In 1978, a constitutional amendment made the Attorney General of Pennsylvania an elected position beginning with the 1980 general election.

The mission of the Attorney General's office is to "maintain the highest standards of ethics to protect life, property, and constitutional and consumer rights, to ensure safety and freedom for those living in and visiting the commonwealth."[15]

The office comprises hundreds of prosecutors, attorneys, investigators, agents, and support staff over four divisions (Criminal Law, Public Protection, Civil Law, and the Office of Public Engagement) covering various topics. The office's FY 2024-25 operating budget is $144 million.

The OAG operates the S2SS program established under Act 44. As discussed in more detail later (see Section V), S2SS is an anonymous tipline that allows students to submit information on safety issues, including self-harm incidents, weapons threats, or potential bullying, among other concerns. Act 44 mandates that all school entities within the commonwealth participate in the S2SS program.

Pennsylvania Department of Education (PDE)

PDE oversees all public school districts, public charter schools, career and technical centers, public intermediate units, and the overall education of children in Pennsylvania. PDE's mission is to ensure all students have access to an education that academically prepares them to succeed as productive members of society. This mission includes ensuring the safety and security of schools throughout the commonwealth.

Prior to the passage of Act 33 of 2023, PDE housed the Office for Safe Schools, which worked with all school safety stakeholders (school administrators, parents, police departments, communities, etc.) to create a supportive academic environment for physical and psychological safety. The Office for Safe Schools also maintains the Annual School Safety Reports

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[15] https://www.attorneygeneral.gov/the-office/

with discipline data from all school entities throughout the common-wealth. Discipline data includes incident records on student expulsions, infractions, and out-of-school suspensions, among other information.

Additional Highlights of Act 44 of 2018

Additional initiatives implemented by Act 44, not already discussed, include the following:[16]

- Requiring the chief school administrator of each school entity to appoint a school administrator as the "school safety and security coordinator." As will be discussed in Section V, school safety and security coordinators handle the school entity's safety and security policies in compliance with state and federal laws and serve as the school entity's public liaison on all matters related to safety and security.

- Establish minimum mandatory school safety training for all school employees, including situational awareness, trauma-informed education, behavioral health, suicide and bullying awareness, substance use awareness, and emergency training drills every five years.

- Establishing definitions for school police officers, school resource officers, and school security guards. As discussed later, Act 44 also required specific training requirements for these individuals.

Of these items, the required appointment of school safety coordinators and mandated school safety training added specific duties to local educational agencies upon the passage of Act 44.

School Safety and Security Training

Initially, Act 44 required only three hours of school safety and security training every five years. Act 55 of 2022 amended the statute to now require three hours of instruction per year. Training must meet criteria developed by the SSSC.

On March 29, 2023, the SSSC adopted a new School Safety and Security Training Program vendor. These training courses are designed for all

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[16] Pennsylvania Commission on Crime and Delinquency, *Act 44 of 2018 Key Information for School Entities,* August 2018.

school employees and are free to school entities. These trainings must include the following:[17]

- Situational Awareness,
- Trauma-informed Approaches,
- Behavioral Health Awareness,
- Suicide and Bullying Awareness,
- Substance Abuse Awareness,
- Emergency Training Drills (including fire, natural disaster, active shooter, hostage situation, and bomb threat), and
- Threat Assessment.

The SSSC is responsible for maintaining these training standards and providing access to training for school employees. These training courses are available online for school employees through the SSSC web-site.[18]

Subsequent Acts Impacting Act 44 of 2018

Since the passage of Act 44, several pieces of legislation have further amended the Pennsylvania Public School Code and impacted school safety and security initiatives. Below is an overview of each of these subsequent acts:

- ***Act 18 of 2019*** amends Section 1302-B to add four additional members to the SSSC. The act establishes minimum grant allocations to school districts based on their average daily membership (attendance). Importantly, the act added a requirement for "threat assessment teams" by all school entities, which added additional responsibilities for these entities and the SSSC. In addition, the act proclaims all grant applications confidential and not subject to the Right-to-Know Law and further restricts S2SS to protect records from being released, except for a search warrant containing an affidavit explaining why the records should be released.

- ***Act 67 of 2019*** amends the name of Article XIII-C to School Security. The act makes changes to several definitions within the Articles, such as defining the term commission as The Pennsylvania Commission on Crime

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[17] Pennsylvania Commission on Crime and Delinquency, *School Employee Training Standards Notice*, September 30, 2022.
[18] https://prdpccd.pwpca.pa.gov/schoolsafety/Pages/School-Security-Personnel-Training.aspx, accessed May 10, 2024. New link: https://pak12sstp.org/.

and Delinquency, adding definitions for the terms "independent contractor,[19] "school security personnel,"[20] and "third-party vendor,"[21] and expanding the definitions of school police officer (SPO), school resource officer (SRO), and school security guard (SSG).

Additionally, the act allows a judge to authorize an SPO to carry a firearm (at the school entity's request). Act 67 also amended section 1305-C, 1313-C, and 1314-C regarding the training and credentials required for SPOs, SROs, and SSGs.

- ***Act 91 of 2019*** further amends Article XIII-C, by extending the time that SPOs, SROs, and unarmed SSGs (employed or contracted before September 2, 2019) must complete the Basic School Resource Officer Course offered by the National Association of School Resource Officers or an approved equivalent course. The act also extends the course completion for armed SSGs employed or contracted by a school entity before September 2, 2019. Finally, Act 91 restores arrest authority for SPOs.

- ***Act 30 of 2020*** amends the School Safety and Security Grant Program (Section 1306-B) by outlining specifics for how funds could be used during FY 2020-21. The act created two new sections under Article XIII-B, Section 1312-B, titled COVID-19 Disaster Emergency School Health and Safety Grants for the 2020-2021 school year, and Section 1313-B, titled COVID-19 Disaster Emergency Targeted Health and Safety Grants for the 2020-2021 school year.

- ***Act 55 of 2022*** amends the SSSC (Section 1302-B) to establish new terms for serving on the committee. Before Act 55, members served four years; under Act 55, members can serve four years plus one additional consecutive term.

  Act 55 also establishes a new section (Section 1305.1-B) titled Survey of School Mental Health Services. This section provides for developing and distributing a survey to measure mental health services in schools throughout Pennsylvania.

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[19] Independent contractor is an individual, including a retired federal agent, retired state, municipal, or military police officer, or retired sheriff or deputy sheriff, whose responsibilities, including work hours, are established in a written contract with a school entity or a nonpublic school to perform school security services.
[20] School security personnel are school police officers, school resource officers, and school security guards.
[21] A third-party vendor is a company or entity that provides school security services and is approved by the Office for Safe Schools under section 1302-A(b)(8) or the commission under section 1315-C(2).

Further, Act 55 amends the SSSF (Section 1306-B), establishing provisions for FY 2022-23 funding, including a five percent allocation from PDE for the Ready-to-Learn Block Grant and how those funds should be used.

Act 55 further amends Section 1309-B (School Safety and Security Coordinator), establishing a timeline for appointments, vacancies, and training requirements. The act also adds Section 1316-B (School Safety and Security Coordinator Training), which outlines the minimum training for school safety and security coordinators. This section also tasks the committee with the responsibility of developing the training, determining who the training should be available to, who can provide the training, where funding for the training should come from, and reviewing and updating the training as necessary.

Act 55 also establishes the School-based Mental Health Internship Grant Program (Section 1318-B) and added additional definitions to Article XIII-C.

- ***Act 33 of 2023*** added the Homeland Security Director of the Office of Homeland Security as a nonvoting member of the SSSC. The act also directs the committee to establish an Executive Committee[22] that meets at least every two months to identify and review current and emerging school safety issues and provide guidance and recommendations for consideration.[23] In addition, Section 1302.1-B outlines the committee's duties.

  Act 33 amends Section 1306-B (School Safety and Security Grant Program), directing the committee to commit funding from the SSSF to school safety and security and mental health grants for FY 2023-24 and FY 2024-25.

  The act further amends the school code to add sections 1306.1-B (Targeted School Safety Grants for Nonpublic Schools and School Entities Program), Section 1306.2-B (Standardized Protocols), Section 1310.1-B (County Safe Schools' Collaborative), Section 1315.1-B (School Mental Health Grants for 2023-2024 school year), Section 1319-B (Reporting and Memorandum of Understanding), and Section 1320-B (Safe Schools Advocate in School Districts of the First Class), from PDE to PCCD's authority (many

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[22] The Executive Committee is comprised of representatives from the Office of Attorney General (OAG), Pennsylvania Department of Education (PDE), Pennsylvania State Police (PSP), Pennsylvania Emergency Management Agency (PEMA), and the legislature.

[23] The Executive Committee reviews data and trends from the Safe2Say Something Program, collaborative county-level school safety efforts, bystander reporting, crisis intervention, emergency preparedness, and strategies for preventing school threats.

of the duties of PDE's Office for Safe Schools were moved under PCCD and the SSSC's purview).

In addition, the act further amends Section 1316-B (School Safety and Security Coordinator Training), allowing individuals who are subject to the requirements in sections 1205.2 and 1205.5 for professional education to receive credit for completed school safety and security coordinator training.

- *Act 34 of 2023* directs PCCD to use $5,000,000 from the SSSF for grants implementing innovative school safety and security initiatives.

- *Act 55 of 2024* amends Article XIII-C (School Security) to add Section 1316-C (School Security Personnel), requiring that every school district has at least one full-time trained school security personnel on duty during the school day unless the school district has received a waiver. This provision begins with the 2024-2025 school year. School entities may use the School Safety and Security Grant Program funding to hire or contract with school security personnel. In addition, a school entity may apply for a waiver from this requirement if it can provide documentation that it acted in good faith and could not hire or contract school security personnel. The waiver is good for one year.

  The act further amends the Public School Code to create the School Security Personnel Restricted Account (Section 1316.1-C) within the SSSF. Subject to the availability of funding, in FY 2025-26, school districts can apply for reimbursement, at most $50,000, for the employment of one trained full-time security personnel. The committee will publicly list the school districts that received these reimbursements on their website.

  Act 55 also amends Section 1309-B (School Safety and Security Coordinator), requiring an annual report containing the number of school security personnel, broken out by type and both armed and unarmed, the location of each school security personnel, the type and completion dates of training, and a listing of any other individuals assisting with school safety-related duties. This report, not subject to the Right-to-Know Law, will be presented to the school entity's board and submitted to the committee.

  The act also amends the School Safety and Security Grant Program (Section 1306-B), setting aside $100 million for school safety and mental health grants and $20,700,000 for targeted school safety grants during the 2024-2025 fiscal year. Schools may also apply for funding to purchase lockable cell phone bags once they adopt a policy banning students' use of cell phones

during the school day. Finally, Act 55 creates Section 1314.1-B (School Safety and Mental Health Grants for the 2024-2025 School Year), which allows funds from the SSSF to be used for school safety and mental health grants.

Since its requirements are effective for the 2024-2025 school year, Act 55 is beyond the scope of this report. However, several of Act 55's changes impact key topics within this study and will be referenced where relevant.

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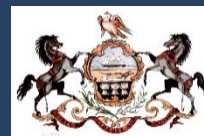
SECTION III
UPDATE ON ACT 44 INITIATIVES

Overview

Act 44 established a wide range of school safety and security initiatives. Importantly, Act 44 created the School Safety and Security Committee (SSSC), supported by the staff of the Pennsylvania Commission on Crime and Delinquency (PCCD). Comprised of statutory designations, legislative and gubernatorial appointments, and subject-matter experts, SSSC convenes once every two months, to deliberate on a wide range of school safety and security initiatives and issues affecting school entities in Pennsylvania.

The School Safety and Security Grant Program is a core responsibility of the SSSC. Distributing over $600 million to school entities since 2018, the School Safety and Security Grant Program has experienced several iterations of its funding streams and distribution models over the last six years. Notably, our analysis found significantly more grant program participation since the COVID-19 pandemic, with the number of school entities submitting grant applications increasing from 539 in 2018-19 to over 730 schools per cycle in the years since 2020. While security planning, purchasing of security-related technology, and security-related technology training was the single most widely used grant activity, funding related to mental and behavioral health constituted the majority – 54 percent – of all grant-funded activities since 2018.

The SSSC adopted a set of behavioral health and physical security standards for school entities, also known as "baseline criteria" standards, in 2021 (and later revised in 2023)." The baseline criteria standards are broken into three different levels, with Level 1 standards providing fundamental safety practices and features that a school entity must have in place. In contrast, standards in Level 2 and Level 3 include optional, advanced practices and features. Some of the recommended school safety practices for school entities listed in the baseline criteria standards include providing annual training to school entity employees on school safety-related topics, adopting an emergency preparedness or emergency operations plan, and establishing at least one threat assessment team.

Issue Areas

A. School Safety and Security Committee

With the passage of Act 44 of 2018, a newly created School Safety Security Committee (SSSC) was created within the Pennsylvania Commission on Crime and Delinquency (PCCD). The SSSC's primary duties include developing best practices for school safety and administering the School Safety and Security Grant Program. Within this issue area, we discuss the general operation of the committee and compare its structure with similar entities found in peer states.

SSSC Operation and Governance

The SSSC provides grant funding for school entities to help them be well-equipped to respond to school safety and security threats and risks. In addition to administering school safety and security-oriented grants, SSSC has developed baseline criteria standards and assessments to help school entities evaluate physical security and behavioral health needs. SSSC also provides threat assessment training and guidelines for school entities and helps train school security personnel.

The SSSC is comprised of 22 members, assembled through statutory designations and legislative, gubernatorial, and joint appointments. Specifically, the SSSC is represented by various agency leaders, subject-matter experts, and policymakers. While there is no set schedule for how frequently members should meet, they typically convene about six times a year (i.e., once every two months).

Within SSSC, different workgroups focus on a wide range of Pennsylvania school safety and security issues. These workgroups comprise policymakers, representatives from state agencies, and experts, and they typically meet on an *ad hoc* basis. The following is a list of workgroups that currently operate under SSSC:

- Baseline Standards Criteria Workgroup
- Behavioral Health/School Climate Assessment Workgroup
- Community Violence Prevention Workgroup
- Physical/Policy/Training Assessment Criteria Workgroup
- Provider and Registration Criteria Workgroup
- School Survey Workgroup
- Threat Assessment Workgroup
- Trauma-Informed Approaches Workgroup

Other State Organizational Comparisons

As part of our study, we examined organizational structures for school safety and compliance in other states. Specifically, we reviewed the following:

- Wisconsin Department of Justice's Office of School Safety
- Ohio Department of Public Safety's School Safety Center (also known as the "Ohio School Safety Center")
- Florida Department of Education's Office of Safe Schools
- Maryland State Department of Education's Center for School Safety (also known as the "Maryland Center for School Safety")
- Virginia Department of Criminal Justice Services' Center for School and Campus Safety (also known as the "Virginia Center for School and Campus Safety")

We selected Wisconsin, Ohio, Florida, and Maryland as peer states because their respective school safety agencies/offices had jurisdiction over some school safety and security initiatives absent from PCCD. Notably, these state agencies operated their school safety reporting tip lines independently or in partnership/collaboration with other agencies. We also included Virginia because it is a state where school safety-related initiatives are collocated within a criminal justice agency (as are about a third of the states). Additionally, the pupil/teacher ratio (Pennsylvania 13.4 and Virginia 14.4) and overall graduation rate (Pennsylvania 87 percent and Virginia 89 percent) in Pennsylvania are similar to Virginia's.[24]

Wisconsin, Ohio, and Florida school safety offices operate within larger state agencies. The Maryland Center for School Safety was initially designated as an independent unit within the state government, but it relocated within the Maryland State Department of Education following the passage of the Maryland Safe to Learn Act in 2018.[25] Exhibit 6 provides general similarities and contrasts between PCCD and selected states identified above.

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[24] The pupil/teacher ratios and graduation rates (2021-22 figures) are based on the information published by the National Center for Education Statistics. For pupil/teacher ratios, *see* https://nces.ed.gov/ccd/tables/202122_summary_2.asp, accessed January 7, 2025. For graduation rates, *see* https://nces.ed.gov/programs/coe/indicator/coi/high-school-graduation-rates, accessed January 7, 2025.

[25] Maryland General Assembly, *2022FY – Operating Budget Analysis – R00A06 – MSDE Maryland Center for School Safety*. According to the Maryland General Assembly's budget analysis, the center was relocated under the Maryland State Department of Education "following several high profile incidences of gun violence in Maryland and nationwide." The Maryland Center for School Safety operates as an independent unit within the Maryland State Department of Education.

Exhibit 6

Comparison of PCCD's Functions to Other State School Safety Offices*

School Safety Agency/Office	Provide Grants?	Oversee School Safety and Security Standards?	Oversee School Safety Reporting Tipline?	Provide Threat Assessment Resources/Training (e.g., guidelines, model plans/policies)?
Pennsylvania Commission on Crime and Delinquency	✓	✓	✗	✓
Wisconsin Department of Justice's Office of School Safety	✓	✓	✓	✓
Ohio Department of Public Safety's School Safety Center	✓	✓	✓	✓
Florida Department of Education's Office of Safe Schools	✓	✓	✓	✓
Virginia Department of Criminal Justice Services' Center for School and Campus Safety	✓	✓	✗	✓
Maryland State Department of Education's Center for School Safety	✓	✓	✓	✓

Note:
*/ Other agencies in Ohio also administer school safety and security-oriented grants. In Virginia, the state Department of Education also offers grant opportunities. Regarding reporting tiplines, Florida's Department of Education oversees the state's reporting tipline in collaboration with the Florida Office of Attorney General and the Florida Department of Law Enforcement. Virginia does not have a statewide school safety reporting tipline that a state agency oversees. Specifically, the United States Department of Justice's Bureau of Justice Assistance did not identify a school safety tip line for Virginia, according to United States of Department of Justice's Bureau of Justice Assistance, *Tips and Leads and Threats to Life: Statewide School Safety Tip Lines Chart*, September 21, 2023.
Source: Developed by LBFC staff from information provided by the Pennsylvania Commission on Crime and Delinquency, Wisconsin Department of Justice Office of School Safety, Ohio Department of Public Safety's School Safety Center, Florida Department of Education's Office of Safe Schools, Virginia Department of Criminal Justice Services' Center for School and Campus Safety, Virginia Department of Education, and Maryland Center for School Safety.

PCCD shares some commonalities with the states we reviewed. For example, the states have grant opportunities/programs, develop best practices or model guidelines for school safety and security standards, and provide training on or resources for threat assessments. State laws and statutes often direct school entities to comply with school safety and security standards, though designated school safety offices in states assist in improving upon existing requirements and supporting schools in meeting the standards.

We found that Pennsylvania and our peer cohort (except Virginia) had statewide school safety reporting tip lines that students could access to report suspicious activities or concerning behaviors. In Pennsylvania, there is the Safe2Say Something program, which serves as an anonymous reporting tipline. Unlike other states presented in Exhibit 6, the Office of the Attorney General operates the program separately from PCCD. States in our cohort have respective school safety offices operate their school safety reporting tiplines independently from or in collaboration with other agencies. Florida, for example, has a reporting tipline, FortifyFL, which is operated in collaboration with the state Department of Education (FLDOE), the state Office of Attorney General, and the state Department of Law Enforcement. However, in Wisconsin, the state's reporting tipline is independently operated by the state Department of Justice's Office of School Safety. Virginia, on the contrary, does not have a statewide tip line that a state agency oversees.[26] Section V of the report discusses the Safe2Say Something program in more detail.

Similar to SSSC, Maryland and Wisconsin have established a committee/board responsible for producing school safety and security recommendations. For example, in Wisconsin, there is an advisory committee under the state Department of Justice's Office of School Safety (WIOSS). The committee includes staff members of the WIOSS, representatives from other Wisconsin state agencies, and nongovernmental entities/organizations.[27] In March 2019, WIOSS, with the contributions of this advisory committee, published its *Comprehensive School Security Framework*, which outlined and recommended school safety and security practices for Wisconsin schools. The topics covered in the framework included, but were not limited to, school climate, routine security practices, security assessments, physical security enhancements, law enforcement/fire/EMS partnerships, and crisis response.[28]

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[26] The United States Department of Justice's Bureau of Justice Assistance did not identify a school safety tip line for Virginia. For more information, *see* United States of Department of Justice's Bureau of Justice Assistance, *Tips and Leads and Threats to Life: Statewide School Safety Tip Lines Chart*, September 21, 2023. We attempted to reach Virginia to inquire whether they have a statewide reporting tipline but did not hear back.

[27] Based on the list of memberships listed in the Wisconsin Department of Justice's Office of School Safety, *Comprehensive School Security Framework*, March 18, 2019.

[28] Wisconsin Department of Justice's Office of School Safety, *Comprehensive School Security Framework*, March 18, 2019.

The Center for School Safety (MCSS) in Maryland houses the School Safety Subcabinet and School Safety Advisory Board. Further, pursuant to §7-1503 of the Maryland Education Article, the School Safety Subcabinet comprises the State Superintendent, the Secretary of State Police, the Attorney General, the Secretary of Disabilities, the Secretary of Health, and the Executive Director of the Interagency Commission on School Construction.[29] According to MCSS, "the Subcabinet serves as the regulatory authority and as the governing board of the Center."[30] The Subcabinet meets in August, November, February, and May of each fiscal year.[31] In contrast, the School Safety Advisory Board "serves as counsel to the Subcabinet."[32] Under §7-1504 of the Maryland Education Article, the Advisory Board is represented by a wide range of members, including subject-matter experts, school staff members (e.g., a classroom teacher, a school principal, and a school resource officer), law enforcement, non-governmental entities, and legislative appointments. The Advisory Board convenes on the first Monday of October, December, February, March, and June.[33]

Steering committees that serve as coordinating bodies or perform other administrative roles are becoming increasingly popular. This concept is similar to the "Executive Committee," which currently exists within Pennsylvania's SSSC and has, according to the PCCD, proven to be a reliable means of coordinating members on critical or timely school safety issues.[34]

In Ohio, when the state announced the development of the Ohio School Safety Center (OSSC), the Governor established the School Safety Working Group. The Working Group was designed to "evaluate current issues regarding school safety and advise the Ohio School Safety Center on its work."[35] Ohio's Governor announced the members of the Working Group in December 2019, which included subject-matter experts, state agency representatives, representatives from schools and school districts, individuals from nongovernmental entities, and law enforcement officials.[36] In addition to the Working Group, the Ohio Student Safety Advisory Council under OSSC includes at least four representatives from Ohio's four school safety zones (see also Section VI). According to OSSC, members of the Student Advisory Council are responsible for "identify[ing]

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[29] Each of these members may choose to have a designee to represent them in their absence. The State Superintendent (or their designee) shall chair the Subcabinet.

[30] https://schoolsafety.maryland.gov/Pages/MCSS-Subcabinet.aspx, accessed December 19, 2024.

[31] Maryland Center for School Safety, *School Safety Subcabinet Bylaws*, August 14, 2023.

[32] https://schoolsafety.maryland.gov/Pages/MCSS-Advisoryboard.aspx, accessed November 14, 2024.

[33] Maryland Center for School Safety, *School Safety Subcabinet Advisory Board Bylaws*, December 2023.

[34] As an example, PCCD representatives noted that the executive committee was able to organize and discuss issues related to "swatting" in southwestern Pennsylvania.

[35] Office of Governor of Ohio, *School Safety Working Group Members Announced*, December 16, 2019.

[36] Ibid.

concerns about safety from their peers and creat[ing] local subcommittees to develop innovative solutions to address them." The Student Advisory Council then presents its findings to the School Safety Working Group to help develop solutions and support for school safety.[37]

Other agencies are also involved in shaping school safety and security initiatives in Ohio. For example, the Ohio Attorney General's (OHOAG) office previously established a School Safety Task Force in December 2012, which, according to its report from 2013, "has met regularly over several months to address needs related to school safety plans and operations, training and local partnerships to manage school emergencies, and the impact of mental health issues on school safety."[38] The task force comprised experts from state agencies and nongovernmental entities, such as public safety officials, representatives from state agencies, mental health professionals, and school personnel.[39]

In Florida, there is no specific advisory committee or council on school safety/security under the Office of Safe Schools. Instead, the Marjory Stoneman Douglas High School Public Safety Commission, which operates under the Florida Department of Law Enforcement, serves as a school safety-oriented advisory group in the state. The Commission was established during the 2018 legislative session, and it was "formed to specifically analyze information from the school shooting and other mass violence incidents in the state and address recommendations and system improvements."[40] The Commission is composed of 16 voting members, which includes five members appointed by the President of the Senate, five members appointed by the Speaker of the House of Representatives, five members appointed by the Governor[41], and the Commissioner of the Department of Law Enforcement. The Secretary of Children and Families, Secretary of Juvenile Justice, Secretary of Health Care Administration, and Commissioner of Education serve as ex officio, nonvoting members of the Commission.

The Marjory Stoneman Douglas High School Public Safety Commission established committees responsible for gathering facts and making recommendations on three topics, which were (1) School Environmental

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[37] Ibid.

[38] Ohio Attorney General, *School Safety Task Force – Recommendations and Resources: Local Partnerships are Vital in Managing School-based Critical Incidents*, June 2013.

[39] https://www.ohioattorneygeneral.gov/State-and-Local-Government/Schools/School-Safety-Task-Force, accessed November 22, 2024.

[40] https://www.fdle.state.fl.us/MSDHS/Home, accessed November 21, 2024. The Commission's duties, as well as information related to its membership, are listed forth in s. 943.687 ("Marjory Stoneman Douglas High School Public Safety Commission") of the Florida Statutes.

[41] Under section 943.687 ("Marjory Stoneman Douglas High School Public Safety Commission") of the Florida Statutes, the Governor appoints the chair from the members of the Commission.

Safety Incident Report[42], (2) Threat Management, and (3) Active Assailant Response.[43] These committees are composed of representatives from various state agencies, school entities, and law enforcement offices. Notably, the School Environmental Safety Incident Report Committee, which is chaired by a representative from the FLDOE's Office of Safe Schools[44], focuses on addressing issues relating to incident reporting through the School Environmental Safety Incident Report.

In Virginia, the state Department of Education (VADOE) and the state Department of Criminal Justice Services' (VDCJS) Center for School and Campus Safety primarily oversee the state's school safety and security matters. In contrast to Pennsylvania, Virginia does not have a designated school safety/security committee. However, Virginia requires that, at the division level, the superintendent must establish a school safety audit committee that reviews completed school safety audits[45] from public schools and submit any necessary plans to improve school safety.

Finally, in our experience, it is important to highlight the significance of having the "right people discussing the right things" on school safety matters. To this goal, having legislative representation on a statewide school safety advisory board is a strength for several reasons. First, legislative members can best navigate any necessary statutory changes toward improving school safety as they are directly involved in creating and passing legislation. Secondly, legislative members are aware of their educational constituencies (i.e., school districts) and can, therefore, provide an important connection between schools and the policy directives of the board. In Pennsylvania, the SSSC is particularly strong in this capacity. For example, it has legislative members (including bicameral and bipartisan representation), shares in appointments to the board, and includes the Lt. Governor as its chair. In our review of peer states, Pennsylvania's SSSC was a well-balanced model for how other states could develop state-level school safety steering committees.

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[42] The School Environmental Safety Incident Report is a reporting system that collects data on 26 incidents of crime, violence, and disruptive behaviors. The collection of the data is limited to incidents that occur on school grounds and school transportation and at off-campus, school-sponsored events. This overview is based on the Florida Department of Education's presentation slides from September 1st, 2022, on the School Environmental Safety Incident Report (SESIR) Workgroup.

[43] There is a committee for each of these three topics.

[44] https://www.fdle.state.fl.us/MSDHS/Committee-Meetings, accessed November 21, 2024.

[45] Public schools in Virginia are required to conduct an annual school safety audit, which assesses school safety conditions. The Virginia Center for School and Campus Safety previously established five components for the school safety audit program, which include the Virginia School Safety Survey, Division Safety Survey, Virginia School Crisis Management Plan Review and Certification, Virginia School Survey of Climate and Working Conditions (administered in the Spring), and School Safety Inspection Checklist (due every three years). The Center for School and Campus Safety collects, analyzes, and disseminates various school safety data and school safety audit information. For more information on Virginia's school safety audit program, *see* https://www.dcjs.virginia.gov/virginia-center-school-and-campus-safety/virginia-school-safety-audit-program.

B. School Safety and Security Grant Program

A key outcome of Act 44 was the School Safety and Security Grant Program (grant program), which the SSSC administers. Grants disbursed through this program are for school mental health, safety, and security initiatives, such as conducting safety and security assessments and developing and piloting violence prevention curricula. As directed by SR 178, we reviewed the grant funding distribution process and how schools reported using the funds.

School Safety and Security Grant Program Funding Sources

The School Safety and Security Grant Program is financed primarily through the School Safety and Security Fund (SSSF). While the grant program receives state funding through the budget process, federal funding has also been used to expand grant funding opportunities. Notably, Act 30 of 2020 authorized SSSF to accept funding from the federal Coronavirus Aid, Relief, and Economic Security (CARES) Act.

The CARES Act was enacted in response to the COVID-19 outbreak to provide financial assistance to state and local governments, individuals, and businesses.[46] The CARES Act authorized $150 billion in federal Coronavirus Relief Fund monies to be distributed directly to state and local entities to support costs incurred from the pandemic.[47] The CARES Act also established the Elementary and Secondary School Emergency Relief (ESSER) Fund, which provided emergency relief funds to school districts to address the impact of COVID-19.[48]

The funding allocation for the 2023-24 grant program included federal Coronavirus State and Local Recovery Funds (SLFRF) from the American Rescue Plan Act, which was signed into law in 2021. Similar to the CARES Act funding, SLFRF was targeted at helping state, territorial, local, and Tribal governments respond to and recover from the COVID-19 pandemic.[49]

In total, from 2018-19 to 2023-24, $688.3 million was allocated to SSSF. Exhibit 7 shows allocations to the program each school year.

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[46] CARES Act, H.R. 748, 116th Cong. (2020).
[47] https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/coronavirus-relief-fund, accessed November 1, 2024.
[48] https://www.ed.gov/grants-and-programs/formula-grants/response-formula-grants/covid-19-emergency-relief-grants/elementary-and-secondary-school-emergency-relief-fund, accessed November 1, 2024.
[49] https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds, accessed November 1, 2024.

Exhibit 7

Allocations to the School Safety and Security Fund*
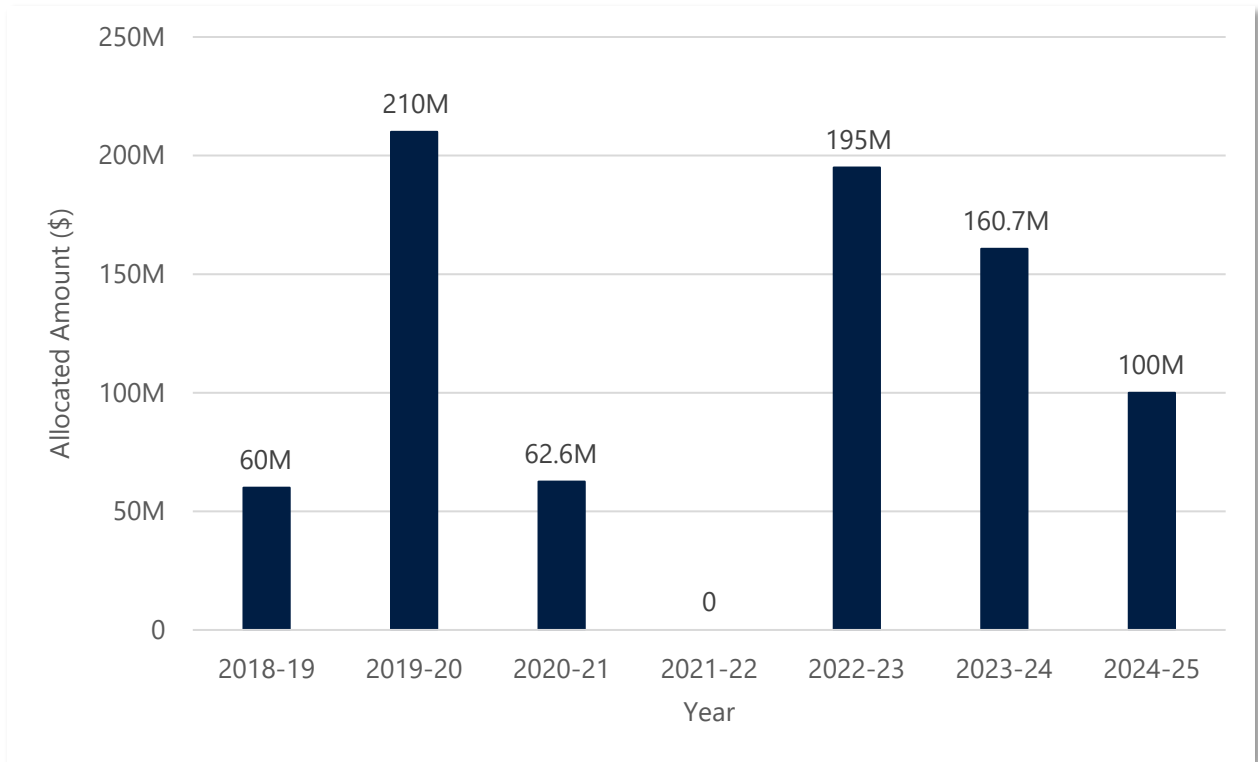
*/ Per PCCD the $210m allocation was reflected in FY 20-21 to address COVID-19 in schools.
Source: Developed by LBFC staff from information provided by PCCD.

As shown in Exhibit 7, the largest funding allocation occurred in 2019-20. Timing differences actually reflect that amount as $210 million in FY 2020-21, which included $150 million in federal CARES Act funding and $60 million in state appropriation. Further, in 2020, $62.6 million was allocated for SSSF, which included $49.8 million in ESSER funding and $12.8 million in state appropriation. In 2023, a total of $160.7 million was allocated to SSSF, which included $90 million from SLFRF and $70.7 million in state appropriation.

School Safety and Security Grant Distribution Process

Once state and federal funds are allocated to SSSF, the SSSC initiates the grant distribution process. The SSSC solicits and reviews grant applications from public and nonpublic schools, educational support services, intermediate units, and other entities and distributes grant monies accordingly. Over the years, Act 44 and subsequent legislative changes to

the School Safety and Security Grant Program determined the grant distribution amount for public and nonpublic schools, educational support services, intermediate units, and other eligible entities.[50]

Evolution of Grant Distribution Formulas. Each year, the SSSC distributes funding according to directions provided in the Public School Code (as amended). In some years, that has meant distributing funding through a meritorious and competitive award process, and in other years, it has been formula-driven. Although the funding itself is straightforward, numerous statutory changes have increased funding opportunities and/or altered the grant purposes.

Initially, Act 44 of 2018 set the minimum distribution amounts for meritorious awards at $25,000. However, this provision was later updated by Act 18 of 2019, which updated the grant distribution formula to consider a school district's average daily membership when determining meritorious grant distributions. Under Act 18, a school entity was eligible to receive a meritorious award ranging from $30,000 up to $45,000, with higher amounts distributed for school entities with higher average daily membership. Act 18 also capped the additional amount (i.e. in addition to minimum meritorious awards) that a school entity can receive under the grant program at $450,000.[51]

For FY 2020-21, instead of distributing grant funding with minimum allocation amounts listed in Act 18 of 2019, Act 30 of 2020 was used as a guideline for the distribution process. Act 30 repurposed the SSSF to be used for COVID-19 Disaster Emergency School Health and Safety Grants for the 2020-21 school year. School entities could use this grant funding for health and safety, such as purchasing educational technology (for distance learning), cleaning and sanitizing products, and infrared cameras.

Through Act 30, school entities that applied for the grant received $120,000. Any leftover funds following the first round of grant distribution were disbursed to each school entity based on the school district's 2018-19 average daily membership (ADM). For intermediate units (IU), charter schools, and career and technical centers (CTC) that applied for the grant, each received $90,000.[52] Due to COVID-19 emergency funds disbursed to school entities in 2020-21, no funds were distributed in 2021-22.

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[50] Except for the 2021-22 school year, there have been amendments to the School Safety and Security Grant Program each year since Act 44's enactment.

[51] First-class (Philadelphia City School District) and first-class A (Pittsburgh School District) school districts are exempt from this requirement. For these entities, additional funding is capped at seven and three percent of the grant program's available funds, respectively.

[52] Intermediate units were also permitted to request targeted grants on behalf of the nonpublic schools they serve. Each grant was capped at $10,000.

Act 55 updated the scope of the SSSF to cover grant uses related to mental health support, such as mental health early intervention and suicide awareness and prevention. Act 55 also revised the distribution formula to provide additional base funding in the 2022-23 school year, with each eligible school district receiving a base award of $100,000 and each eligible IU, charter school, and CTC receiving $70,000 in physical security needs and $70,000 for behavioral health. Each of the eligible school entities received a share of the remaining funds following the first round of distribution based on the school district's 2020-21 ADM. Beginning with the 2022-23 school year, school entities were required to use the grant funding to fulfill Level 1 requirements of PCCD's baseline criteria standards (see discussion that follows). However, according to PCCD, if they have already fulfilled Level 1 requirements, "then they can expend their funding on any eligible activities allowed for in the law."[53]

In 2023-24, the funding distribution for school safety and security grants reverted to the meritorious award system previously used in 2019-20 (Act 18 of 2019). Act 33 also outlined the school mental health grants distribution process for 2023-24.[54] These mental health grants were distributed under the same formula as those distributed in 2022-23—that is, school districts applying for the grants each received $100,000, and IUs, CTCs, and charter schools applying for the grants each received $70,000 for physical security needs and $70,000 for behavioral health. Additionally, each eligible school entity received a share of the remaining funds following the first distribution round based on the school district's 2021-22 ADM. Exhibit 8 illustrates an overview of the grant distribution formulas for the School Safety and Security Grant Program from 2018-19 through 2023-24.

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[53] Per PCCD staff, October 2024.
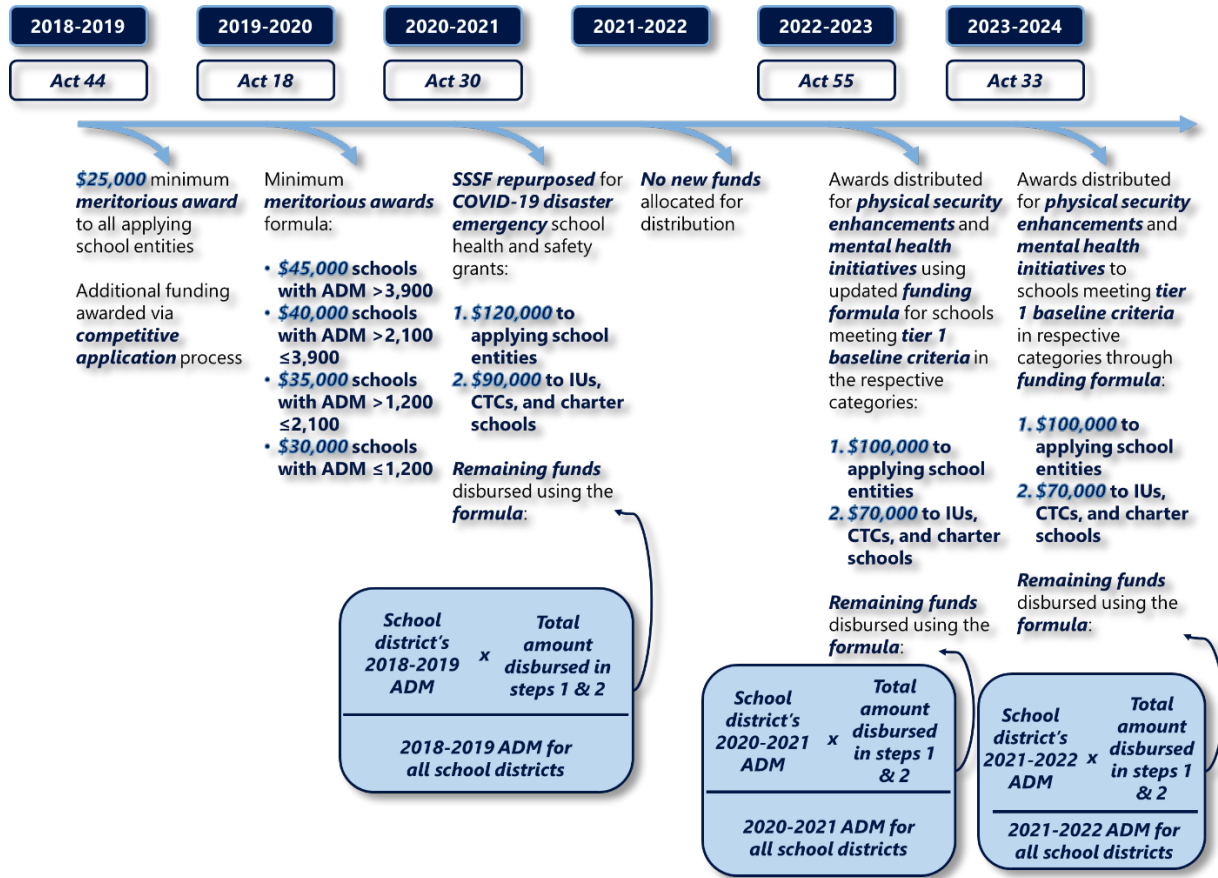[54] Beginning with Act 33 of 2023, SSSC took over administration of the Targeted School Safety Grants for Nonpublic Schools and School Entities Program from PDE. This grant was initially referred to as "Safe Schools Targeted Grants Program." Intermediate units were permitted to request up to five percent in indirect/administrative costs for grants received by nonpublic schools.

Exhibit 8

Act 44's Original Grant Distribution Formula Continues to Evolve with Added Complexities
(2018-19 through 2023-24)

2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
Act 44	*Act 18*	*Act 30*		*Act 55*	*Act 33*

$25,000 minimum **meritorious award** to all applying school entities

Additional funding awarded via **competitive application** process

Minimum **meritorious awards** formula:

- **$45,000 schools** with ADM >3,900
- **$40,000 schools** with ADM >2,100 ≤3,900
- **$35,000 schools** with ADM >1,200 ≤2,100
- **$30,000 schools** with ADM ≤1,200

SSSF repurposed for **COVID-19 disaster emergency** school health and safety grants:

1. **$120,000** to applying school entities
2. **$90,000** to IUs, CTCs, and charter schools

Remaining funds disbursed using the **formula**:

$$\frac{\text{School district's 2018-2019 ADM} \times \text{Total amount disbursed in steps 1 \& 2}}{\text{2018-2019 ADM for all school districts}}$$

No new funds allocated for distribution

Awards distributed for **physical security enhancements** and **mental health initiatives** using updated **funding formula** for schools meeting **tier 1 baseline criteria** in the respective categories:

1. **$100,000** to applying school entities
2. **$70,000** to IUs, CTCs, and charter schools

Remaining funds disbursed using the **formula**:

$$\frac{\text{School district's 2020-2021 ADM} \times \text{Total amount disbursed in steps 1 \& 2}}{\text{2020-2021 ADM for all school districts}}$$

Awards distributed for **physical security enhancements** and **mental health initiatives** to schools meeting **tier 1 baseline criteria** in respective categories through **funding formula**:

1. **$100,000** to applying school entities
2. **$70,000** to IUs, CTCs, and charter schools

Remaining funds disbursed using the **formula**:

$$\frac{\text{School district's 2021-2022 ADM} \times \text{Total amount disbursed in steps 1 \& 2}}{\text{2021-2022 ADM for all school districts}}$$

Source: Developed by LBFC staff from legislation and fiscal notes pertaining to the School Safety and Security Grant Program.

School entities may use funding during the project period which may be extended over multiple school years up to a maximum of five years. No specific regulation prohibits school entities from using the funds in the preceding school year to finance safety and security needs for their up-coming school year. For example, if a school entity received funding from the School Safety and Security Grant Program during the 2019-20 school year, that fund does not necessarily need to be spent in that school year.

Analysis of Grant Distributions. In total, PCCD distributed $661 million in grants to public and nonpublic schools, educational support services, and other entities from 2018-19 through 2023-24. Exhibit 9 shows the total grant distribution for each of these years.

Exhibit 9

Grant Amounts Distributed to School Entities by Grant Type (2018-19 through 2023-24)*

Program Type	Award Amount ($ Millions)
CARES Act	$149.5
ESSER	49.8
Mental Health	181.7
School Safety and Security	280.1

School Year	CARES Act ($ Millions)	ESSER ($ Millions)	Mental Health ($ Millions)	School Safety and Security ($ Millions)	Year Total ($ Millions)
2018-19	$-	$-	$-	$60.2	$60.2
2019-20	-	-	-	61.2	61.2
2020-21	149.5	49.8	-	15.1	214.4
2021-22	-	-	-	-	-
2022-23	-	-	91.7	92.3	184.0
2023-24	-	-	90.0	51.3	141.3
Total	**$149.5**	**$49.8**	**$181.7**	**$280.1**	**$661.0**

Note:
*/ Figures in this exhibit are original (not adjusted) award amounts. No funds were distributed during 2021-22.
Source: Developed by LBFC staff from information provided by PCCD.

As listed in Exhibit 9, during 2020-21, a record $214.4 million was distributed for funding. This figure represents a 250.5 percent increase from the total funds that PCCD distributed in 2019-20. Of those funds, $199.3 million were distributed through federal COVID-19 relief efforts, which includes $149.5 million from the CARES Act funding and another $49.8 million from ESSER funding.

In 2022-23, PCCD distributed $92.3 million from the School Safety and Security Fund, which is relatively higher than other years during the period. However, in 2023-24, that figure dropped to $51.3 million. In that year, over half of the total distributed funds, $90 million, went toward Mental Health grants.

As part of our analysis, we also reviewed the grant distribution data by meritorious awards, competitive awards, and Community Violence Prevention/Reduction (CVPR)[55] programs. Exhibit 10 presents this analysis for each school year.

Exhibit 10

School Safety and Security Grant Distribution by Year and Award Type

School Year	Meritorious Award ($ Millions)	Competitive Award ($ Millions)	CVPR ($ Millions)	State Funding ($ Millions)
2018-19	$ 40.6	$12.9	$ 6.8	$ -
2019-20	36.5	18.6	6.1	-
2020-21	7.5	-	7.6	-
2022-23	-	-	-	92.3
2023-24	18.7	32.6	-	-
Total	**$103.2**	**$64.1**	**$20.4**	**$92.3**

Note:
a/ Figures are in original (not adjusted) award amounts. No funds were distributed during 2021-22. According to PCCD, "State Funding" for 2022-23 refers to PCCD's "$95 million appropriation for physical security in the 'School Safety Security Grants' fund." PCCD also indicated that there were no competitive awards made with 2020-21 funds. This table is a breakdown of the column "School Safety and Security" from the previous exhibit; therefore, this table does not include other grant types, such as mental health grants. Data is unaudited, actual award classifications may have varied by coding classification.
Source: Developed by LBFC staff from information provided by PCCD.

From 2018-19 to 2023-24, $103.2 million of meritorious award funds and $64.1 million of competitive award funds were distributed statewide. PCCD distributed the most meritorious funding ($40.6 million) in 2018-19, while the most competitive award funds ($32.6 million) were distributed in 2023-24. The most CVPR program funding was distributed in 2020-21, at $7.6 million.

Analysis of Grant Distributions by School Class Codes. Pennsylvania has a wide range of school entities serving varying student populations of different sizes. As a result, security needs and, subsequently, costs vary widely throughout the commonwealth. For example, some school entities are responsible for overseeing a significantly

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[55] CVPR programs (Section 1306-B(j)(22) of the Public School Code) are part of the School Safety and Security Grant Program that are designed to reduce community violence, such as increasing access to quality trauma-informed support services and behavioral health care and providing mentoring and other intervention models to children and their families who have experienced trauma or are at risk of experiencing trauma. These programs are typically administered by nonprofits and non-school organizations.

larger student population than others, while school entities of similar size and characteristics may have different priorities related to the school safety and security initiatives supported by the grant (e.g., physical/campus security versus on-campus mental health support, etc.).

Recognizing these distinctions, we also reviewed grant disbursements by populations within the boundaries of each district. We relied upon Local Education Agency (LEA) class codes commonly used by PDE as follows:

- Class 1: Population ≥ 1 million
- Class 1A: Population ≥ 250,000 and < 1 million
- Class 2: Population ≥ 30,000 and < 250,000
- Class 3: Population ≥ 5,000 and < 30,000
- Class 4: Population < 5,000

Other award recipient categories we included were:

- Charter Schools, Approved Private Schools, and Licensed, Private Academic Schools
- Career and Technical Centers
- Intermediate Units
- Other (as determined by LBFC staff)

From 2018-19 through 2023-24, 874 entities received one or more grant awards from PCCD. There is only one Class 1 LEA (Philadelphia City School District). Further, there is only one Class 1A LEA (Pittsburgh School District). There are 108 school districts in Class 2, 367 school districts in Class 3, and 23 school districts in Class 4. Specifically, 12.4 percent, 42 percent, and 2.6 percent of school entities that received one or more grant awards from PCCD were Class 2, Class 3, and Class 4 entities, respectively. Class 1 and Class 1A entities accounted for 0.1 percent of school entities that received one or more grant awards from PCCD.

Further, there were 189 charter schools, approved private schools, and licensed, private academic schools, as well as 103 career and technical centers (CTC) and intermediate units (IU). Charter schools, approved schools, and licensed, private academic schools made up 21.6 percent of the total number of award-receiving entities. There were 82 entities that we labeled under "Other." These "Other" entities made up 9.4 percent of the total number of award-receiving entities.

For analysis purposes, we segregated the grant distributions for each school category by school year, spanning 2018-19 to 2023-24. Exhibit 11 illustrates this analysis.

Exhibit 11

Grant Distribution by Local Education Agency Class Code (from 2018-19 through 2022-23)*
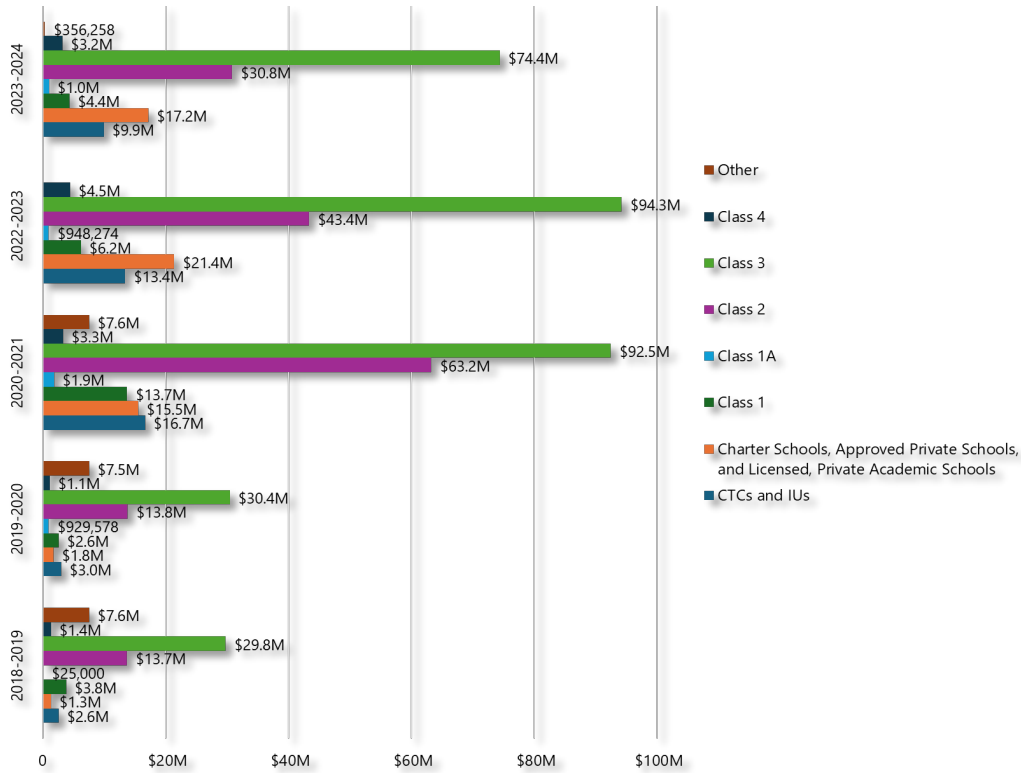
School Category	Total Award Amount ($ Millions)	Percentage of Grand Total of All Awards ($661M)
CTCs and IUs	$ 45.6	6.9
Charter Schools, Approved Private Schools, and Licensed, Private Academic Schools	57.2	8.6
Class 1	30.8	4.7
Class 1A	4.8	0.7
Class 2	164.9	25.0
Class 3	321.3	48.6
Class 4	13.4	2.0
Other	23.0	3.5
Total	**$ 661.0**	**100.0**

Note:

*/ The figures are shown in original (not adjusted) award amounts. No funds were distributed in 2021-22, so that year is omitted.

Source: Developed by LBFC staff from information provided by PCCD.

Classes 1 (Philadelphia City School District) and 1A (Pittsburgh School District) received $30.8 million and $4.8 million, respectively, from 2018-19 through 2023-24. On average, each Class 2, Class 3, and Class 4 entities received a total of $1.5 million, $875,504, and $584,330 with all school years combined, respectively.[56] Nearly half (48.6 percent) of all grant funds were disbursed to these Class 3 entities from 2018-19 through 2023-24.

School Safety and Security Grant Program Funding Use. Section 1306-B of the Public School Code of 1949 delineates allowable activities for grant recipients (also referred to as "specific purposes" within the context of Act 44).[57] Originally 22 items under Act 44, subsequent legislation has supplemented the list of specific purposes found in Section 1306-B(j), which includes a wide array of eligible physical security and behavioral health programs, trainings, and purchases, among other activities. As of June 30, 2024, 30 different grant activities were available to school entities, as highlighted in Exhibit 12. [58]

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[56] We computed these numbers by dividing the total amount of grants disbursed to a given class from 2018-19 to 2023-24 by the total count/number of unique entities in that class. By "unique entities," we refer to entities that have received at least one grant funding between these school years. For example, if a school entity received grant funding in 2018-19 and another one in 2022-23, it would count as one unique entity.

[57] Within this report, we use the terms "allowable activity," "specific purpose," and "eligible funding use" interchangeably to refer to the list of acceptable grant activities outlined by the General Assembly in Section 1306-B of the Public School Code.

[58] Signed into law on July 11, 2024, Act 55 of 2024 added the purchase of cell phone lockable bags as an eligible use of grant funding, provided the school entity applying for the funding adopts a policy relating to prohibiting students' cell phone use during the school day. This 31st eligible use of grant funding was not included in our analysis, as it was not available to school entities during our report scope.

Exhibit 12

School Safety and Security Grant Funding Allowable Purposes

Safety and security assessments that meet the SSSC's established criteria.	A management system for student discipline data, including misconduct and criminal offenses.
Conflict resolution or dispute management, including restorative justice strategies.	Staff training programs for mental health providers in schools should include the use of positive behavior supports, de-escalation techniques, appropriate responses to student behavior that may require immediate intervention, and trauma-informed treatment.
School-wide positive behavior support, including primary (meaning universal), secondary, and tertiary supports systems and interventions in school entities.[a]	Costs associated with the training and compensation of school resource officers and school police officers.
School-based diversion programs, including the costs associated with hiring qualified professional staff to provide program-related assistance and services.[b]	Costs associated with the training and compensation of certified school counselors, licensed professional counselors, licensed social workers, licensed clinical social workers, and school psychologists.
Peer helper programs.	Administration of evidence-based screenings for adverse childhood experiences proven to be determinants of physical, social, and behavioral health, and provision of trauma-informed counseling services as necessary to students based on the screening results.
Programs to reduce community violence, including: i. Increasing access to quality trauma-informed support services and behavioral health care by linking the community with local trauma support and behavioral health systems. ii. Providing health services and intervention strategies by coordinating the services offered by eligible applicants and coordinated care organizations, public health entities, nonprofit youth service providers, and community-based organizations. iii. Providing mentoring and other intervention models to children and their families who have experienced trauma or are at risk of experiencing trauma, including those who are low-income, homeless, in foster care, involved in the criminal justice system, unemployed, experiencing a mental illness or substance abuse disorder, or not enrolled in or at risk of dropping out of an educational institution. iv. Fostering and promoting communication between school entities, communities, and law enforcement. v. Any other program or model designed to reduce community violence and approved by the committee.	Trauma-informed approaches to education, including: i. Increasing student and school employee access to quality trauma support services and behavioral healthcare, including: A. Hiring or contracting with certified school counselors, licensed professional counselors, licensed social workers, licensed clinical social workers, school psychologists, and other professional health personnel. B. Developing collaborative efforts between the school entity and behavioral health professionals to identify students in need of trauma support and to provide prevention, screening, referral, and treatment services to students potentially in need. C. Partnering with community-based organizations for peer or family support. D. Training on youth-focused mental health first-aid for school employees to help recognize signs of mental health distress among their peers. E. Providing activities to improve mental health in a school entity and after-school programming. ii. Programs providing: A. Trauma-informed approach to education in the curriculum, including training of school employees, school directors, and behavioral health professionals to develop safe, stable, and nurturing learning environments that prevent and mitigate the effects of trauma. B. Services for children and their families, who have experienced or are at risk of experiencing trauma, including those who are low-income, homeless, involved in the child welfare system, or involved in the juvenile justice system.
Classroom management.	Risk assessment, safety-related, violence prevention curricula, including dating violence curricula, restorative justice strategies, mental health early intervention, self-care, and suicide awareness and prevention curricula.

Exhibit 12 continued

	Student codes of conduct.		**Implementation of Article XIII-E (threat assessment teams).**
	Training to undertake a districtwide assessment of risk factors that increase the likelihood of problem behaviors among students.		**Expanding telemedicine delivery of school-based mental health services, including equipment.**
	Development and implementation of research-based violence prevention programs that address risk factors to reduce incidents of problem behaviors among students. Examples include programs related to mental health early intervention, self-care, bullying, and suicide awareness and prevention, among others.		**Providing technical assistance for a school entity regarding billing insurance providers to better provide mental health services in a school setting.**
	Thorough, districtwide school safety, violence prevention, emergency preparedness, and all-hazards plans, including revisions or updates to such plans and conducting emergency preparedness drills and related activities with local emergency responders.		**Creating or expanding statewide programs and intervention frameworks, such as school assistance programs, positive behavioral intervention and support, and multitiered systems of support.**
	Security planning, purchasing security-related technology, and training in the use of security-related technology.[c]		**Training and related materials for school employees or students that are evidence-based and focus on identifying the signs and signals of anxiety, depression, suicide, or self-harm in students and best practices for seeking appropriate mental health assistance.**
	Institution of student, staff, and visitor identification systems, including criminal background check software.		**Providing, increasing, or enhancing partnerships between a school entity and a community-based nonprofit organization, a statewide youth-serving nonprofit, or a library for out-of-school programming for at-risk school-age students.**
	Provision of specialized staff and student training programs, including training for Student Assistance Program team members in the referral of students at risk of violent behavior to appropriate community-based services and behavioral health services and training related to prevention and early intervention.		**Coordinating and integrating local and county mental health services and programs for school employees or students.**
	Counseling services for students, including costs associated with the training and compensation of mental health staff or expanding contracts with mental health providers that offer services to students in a school setting.		**Providing online programs, educational materials, and applications to provide supplemental mental health services to students that may include peer support, self-guided evidenced-based therapeutic tools, and clinical interactions.**

Notes:
[a] Under the School-wide Positive Behavioral Interventions and Supports model, supports begin with basic, highly effi-cient interventions offered universally to all students (e.g., reviewing school behavioral policies at the start of a school year) and progress to individualized interventions designed to meet the specific behavioral needs of a given student.
[b] School-based diversion programs are defined in Section 1301-A of the Public School Code of 1949 as "programs and interventions designed to redirect youth who commit minor offenses in school from exclusionary disciplinary practices or formal processing in the juvenile justice system while still holding the student accountable for the stu-dent's actions." These programs can include teen/youth courts, mentoring programs, truancy prevention and inter-vention programs, and restorative justice programs, among others.
[c] Examples of security-related technology include but are not limited to, metal detectors, protective lighting, specially trained canines, surveillance equipment, special emergency communications equipment, automated external defibril-lators, electronic locksets, deadbolts, and trauma kits.
Source: Developed by LBFC staff from information obtained from PCCD.

As previously noted, school entities meeting Level 1 baseline criteria re-quirements may use grant funding for any specified purposes. However, several exceptions apply.

First, Section 1306-B(j.1) grants the SSSC discretion to prioritize grant funding for select purposes within subsection (j). The SSSC is to use data

from the school safety and security surveys established under Section 1305-B (see Section IV) when determining grant allocation priorities. While infrequently used to date, this option does provide the SSSC with additional flexibility to help school entities adapt to the rapidly evolving security ecosystem.

The General Assembly has also carved out other grant opportunities within the section. For example, Act 55 of 2022 identified eight existing funding purposes and established seven additional eligible uses pertaining to mental health.[59] Behavioral health grant funding can only be used for activities deemed to be mental health-related, while activities affecting physical security are only eligible for physical school safety and security grant funding.

The most substantial change to the allowable uses came during the COVID-19 pandemic. As outlined previously, Act 30 of 2020 directed federal funding to the School Safety and Security Fund to support COVID-19 disaster emergency school health and safety grants for the 2020-21 school year. Exhibit 13 shows the seven program activities deemed allowable for the COVID-19 disaster emergency school health and safety grants.

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[59] These eligible uses are Section 1306-B(j) (6) (risk assessment/violence prevention curricula), (10) (development of violence prevention programs), (15) (student counseling services), (17) (positive behavior/de-escalation staff training), (19) (training/compensation of counselors, social workers, and psychologists), (20) (adverse event screening and trauma-informed counseling), (21) (trauma-informed educational approaches), (23) (threat assessment team implementation), (24) (telemedicine delivery of school-based mental health services), (25) (technical assistance for insurance billing mental health services), (26) (creating/expanding statewide programs and intervention frameworks), (27) (mental health training for students/staff), (28) (out-of-school programming partnerships), (29) (integrating local mental health services for students/staff), and (30) (supplemental, online mental health services for students).

Exhibit 13

Specific Purposes for COVID-19 Disaster Emergency
School Health and Safety Grant Funding

Purchase of cleaning and sanitizing products.

Staff training and professional development on sanitation and infectious disease spread.

Purchase of Personal Protective Equipment (PPE), thermometers, infrared cameras, and other necessary items.

Modification of existing areas for social distancing.

Mental health services for students impacted by COVID-19.

Purchase of educational technology for distance learning.

Other necessary health and safety programs, items, or services to address COVID-19.

Source: Developed by LBFC staff from information obtained from PCCD.

PCCD provided us with an extraction of award data, including all grant applications submitted by school entities since 2018. Each application submission detailed which of the approved activities from Section 1306-B(j) the school entity applied for as part of the grant request.

All told, we reviewed 14,858 eligible activities proposed in 4,481 grant applications between 2018-19 and 2023-24. As expected, an influx of grant applications was submitted immediately following Act 44's passage, with 988 submissions from 539 school entities in 2018-19.[60] The number of school entities applying for grant funding increased by almost half during the COVID-19 pandemic, with 774 school entities submitting 775 grant proposals for disaster emergency funding during 2020-21.

Even without funding the following year, high participation among Pennsylvania's schools remained, with 763 and 735 school entities submitting grant requests in 2022-23 and 2023-24, respectively.

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[60] In 2018-19, PCCD provided competitive and meritorious grants a single identifier per school entity. In subsequent years, school entities applying for more than one portion of grant funding (meritorious, competitive, mental health) were provided multiple identifiers. For consistency, we considered 2018-19 grants as if this identification method had been applied.

In 2023-24, 1,323 grant applications were submitted, the most since the program's inception over a half-decade ago. Adding the mental health funding stream in 2022 and Act 34 of 2023's requirement that funding be partially released as a competitive funding opportunity for the 2023-24 grant cycle created more funding opportunities for school entities, likely contributing to this significant increase in grant activity.

Exhibit 14 shows an annual breakdown of grant submissions and school entities participating in the School Safety and Security Grant Program between 2018-19 and 2023-24.

Exhibit 14

Participation in the School Health and Safety Grant Program Increased during and after the COVID-19 Pandemic[*]
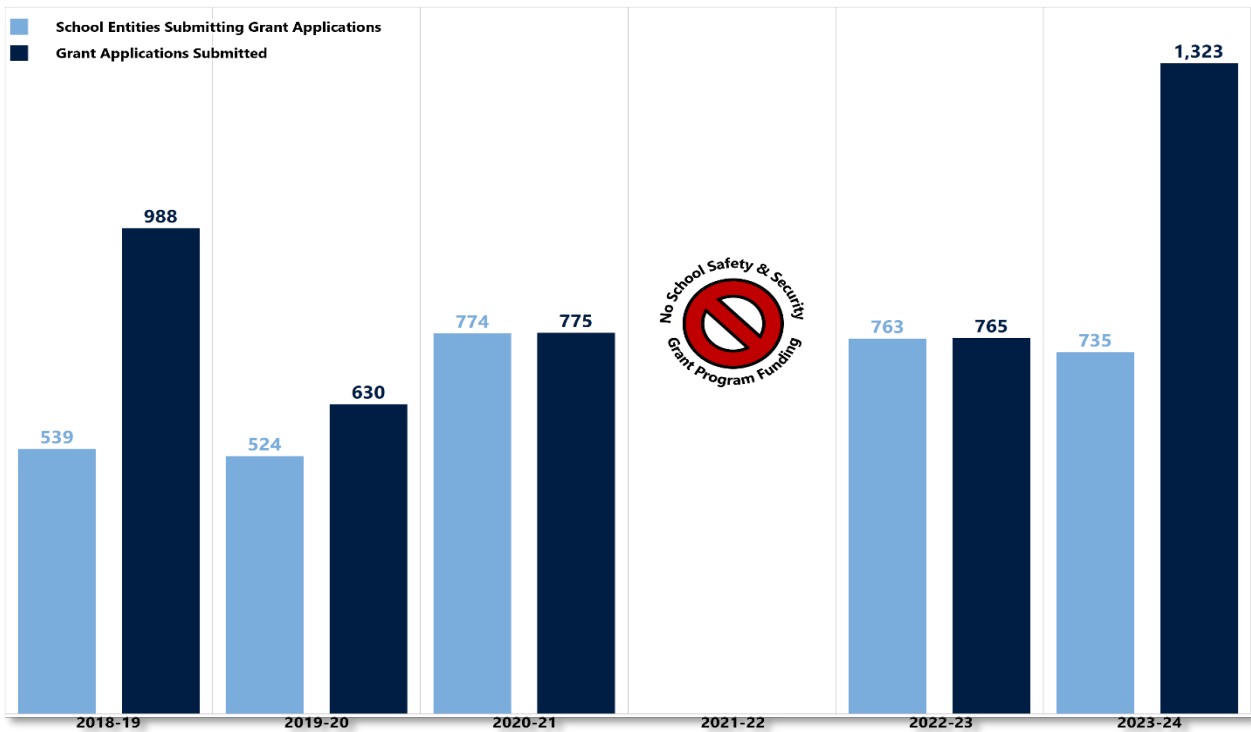
Note:
*/ The number of grant applications submitted (dark blue shading) reflects all applications submitted to PCCD, including those awarded to recipients, still under review by PCCD staff or awaiting SSSC approval, returned to the school entity for clarification or correction, received by PCCD following a submission or resubmission and awaiting review, and requested for withdrawal by the applicant. This number includes multiple applications from a single school entity.
Source: Developed by LBFC staff from information obtained from PCCD.

We also reviewed eligible activities as outlined in Section 1306-B(j) of the Public School Code for each year for which funding was available since 2018. However, because 2020-21 was a unique circumstance with grant

funding allocated according to the guidelines set in Section 1312-B (b) of the Public School Code, we analyzed that year independently from all other years.

Within each allowable activity, we further organized the eligible funding uses by the status of their associated grant at the end of our observation period. For example, within the data set we obtain from PCCD, grants could be classified as follows:

- Awarded to the school entity.

- Still under review by PCCD staff or awaiting SSSC approval.

- Returned to the school entity for clarification or correction.

- Received by PCCD following a submission or resubmission and awaiting review.

- Requested for withdrawal by the applicant.

Exhibit 15 shows the allowable activities under the School Safety and Security Grant Program by award status for 2018-19, 2019-20, 2022-23, and 2023-24.

Exhibit 15

Mental and Behavioral Health-Related Activities Consisted of 54 Percent of All Uses Submitted for Grant Approval

Activity	Awarded	Total
Security Planning and Purchase of Security-Related Technology	2,225	2,288
Student Counseling Services	953	1,129
Training and Compensation of Counselors, Social Workers, and Psychologists	800	942
Positive Behavior/De-Escalation Staff Training	678	788
Trauma-Informed Educational Approaches	651	780
SRO and SPO Training and Compensation	660	679
Risk Assessment, Safety-Related, Violence Prevention Curricula	405	482
School Safety, Violence Prevention, Emergency Preparedness, and All-Hazard Plans	458	472
Mental Health Training for Students and Staff	353	430
SSSC-Approved Safety and Security Assessments	381	403
Creating/Expanding Statewide Programs and Intervention Frameworks	315	393
Student, Staff, and Visitor ID Systems	328	343
Integrating Local Mental Health Services for Students and Staff	281	340
Research-Based Violence Prevention Programs	293	332
School-Wide Positive Behavior Support	304	312
Specialized Staff and Student Training Programs	269	275
Adverse Experience Screening and Trauma-Informed Counseling	208	250
Supplemental Online Mental Health Services for Students	164	210
Partnerships with Nonprofits for Out-of-School Programming	145	182
Conflict Resolution/Dispute Management	168	172
Implementation of Article XIII-E (Threat Assessment Teams)	155	171
Classroom Management	162	169
Risk Factor Assessment Training	154	158
Student Codes of Conduct	89	92
Student Discipline Management System	66	71
Telemedicine Delivery of School-Based Mental Health Services	51	68
School-Based Diversion Programs	49	52
Peer Helper Programs	42	45
Programs Designed to Reduce Community Violence	42	43
Technical Assistance for Mental Health Services Insurance Billing	29	36

Status of Associated Grant

- Awarded to School Entity
- Under Review by PCCD Staff
- Returned to School Entity
- Received by PCCD
- Withdrawal Requested by School Entity

Source: Developed by LBFC staff from information obtained from PCCD.

Of the 14,858 total allowable activities proposed since Act 44 was passed, 12,107 (81 percent) were submitted by school entities in applications in 2018-19, 2019-20, 2022-23, or 2023-24 under the traditional School

Safety and Security Grant Program guidelines outlined in Section 1306-B(j).

Security planning, purchasing security-related technology, and security-related technology training was the most widely used activity, included in 2,288 grant proposals (19 percent) during the period. The other four of the top five most used activities pertained to mental and behavioral health, with student counseling services (nine percent), training and compensation for counselors, social workers, and psychologists (eight percent), positive behavior and de-escalation staff training (seven percent), and trauma-informed educational approaches (six percent) accounting for 30 percent of all funding use.

Over the four years, the mental and behavioral health activities solidified under Act 55 of 2022 comprised 54 percent of all activities submitted for grant approval. This fact is most likely attributed to the increased funding devoted to the School Safety and Security Grant Program, which placed additional emphasis—at least $90 million yearly—on mental health services following the COVID-19 pandemic.[61] Since 2022-23, over 66 percent of all proposed grant activities have pertained to mental or behavioral health.

Of the 12,107 eligible activities we analyzed over the four years, 90 percent had been approved and awarded grant funding by the end of 2023-24, with eight percent still under review by PCCD staff. The remaining activities were part of grant applications that were either returned to the school entity for clarification/correction or awaiting review.

Within approved grants, approximately half of all activities had been identified as eligible for mental health grants within the subset of specific purposes from Section 1306-B(j). However, most proposed activities pertained to behavioral health within grants that had yet to be approved.[62]

According to the PCCD staff we interviewed, this trend most likely stems from the timing differences between competitive and meritorious grants. Competitive grants have a more time-dependent process, requiring approximately three to six weeks. In this process, grant review teams organized into 12 geographical regions individually score and provide feedback on each application before collectively ranking each submission from strongest to weakest.[63]

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[61] As highlighted earlier in this issue area, from the passage of Act 55 of 2022 to the end of the 2023-24 school year, $181.7 million was awarded to mental health services within the School Safety and Security Grant Program. Mental health funding consisted of 50 percent of all awards in 2022-23 and 64 percent in 2023-24.

[62] We found that within grants still under review, returned to the school entity, or awaiting review, anywhere from 76 to 88 percent of all proposed activities were mental health related.

[63] According to PCCD, these teams consist of three to five members, typically with two subject matter experts external to the organization.

Conversely, the timeline for meritorious grants can be more fluid and can be reviewed as soon as submissions are received by PCCD staff. The review process has multiple steps, including examining baseline criteria, school entity budgets, and legal requirements. While PCCD expressed that meritorious grants are typically awarded expeditiously, in actual practice the length of time needed to complete a review depends on the application's content and any additional communication that is required with the school entity to resolve questions.

To test this theory, we compared eligible activities identified as qualifying for mental and behavioral grants under Act 55 to those that did not during the 2022-23 and 2023-24 funding cycles.[64] We found that as of July 2024, 1,229 (15 percent) of the 8,310 activities proposed over the two years had not been awarded to school entities. Further, of those 1,229 unapproved activities, 1,052 were for behavioral health purposes, which the schools had applied for under mental health or school safety and security meritorious grant funding.[65]

During the COVID-19 pandemic in 2020-21, most schools used grant funding to protect against viral infection or to assist with educational adaptations for hybrid learning. The purchase of personal protective equipment (PPE), thermometers, and other safety gear (23 percent), educational technology for distance learning (22 percent), and cleaning and sanitizing equipment (21 percent) consisted of approximately two-thirds of the 2,751 proposed uses of grant funding in 2020-21.

In a reversal of non-pandemic years, in 2020-21, school entities did not devote grant resources to prioritizing mental and behavioral health. Only four percent of all activities during this year went toward this specific use. Realistically, the increased emphasis on mental health activities since 2022 likely stems from unaddressed student needs from this period.[66]

Exhibit 16 shows grant activities aggregated by specific use for allowable expenses under COVID-19 disaster emergency school health and safety grants.

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[64] Funding in previous years had all been awarded to school entities.

[65] Of the 1,052 unapproved activities related to behavioral health, only 60 (six percent) were included as part of school safety and security competitive grant applications.

[66] In the first two years of the School Safety and Security Grant Program, 27 percent of all proposed activities went toward addressing mental or behavioral health needs.

Exhibit 16

School Entities were Primarily Focused on Protective Equipment and Distance Learning during the COVID-19 Pandemic
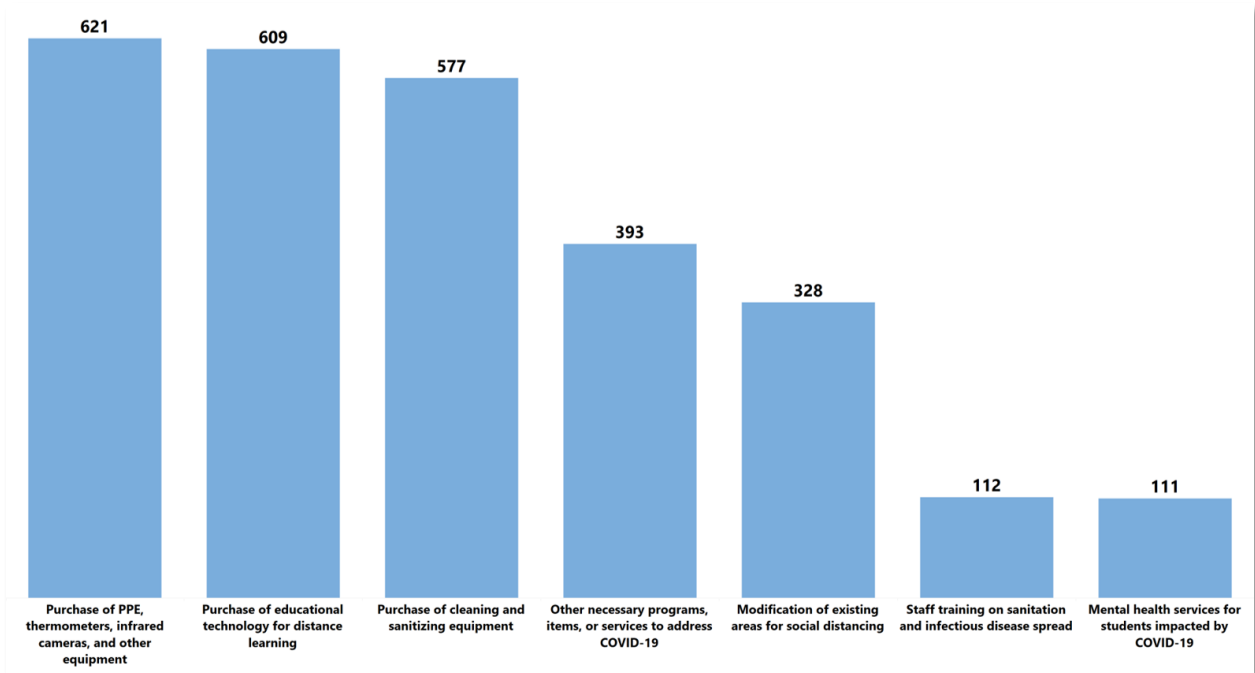
Source: Developed by LBFC staff from information obtained from PCCD.

C. Act 44 and the Development of Baseline Criteria Standards

While Act 44 of 2018 provided significant investments in school safety, it did not lay out guidelines for school entities on prioritizing their funding within the grant's allowable purposes. This problem became apparent to SSSC members as schools were unsure what grant uses should be prioritized over others. To better guide the uses of these investments and ensure foundational school safety and mental health elements in all school entities, the SSSC established baseline criteria standards for physical security and behavioral health in 2021.[67]

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[67] Pennsylvania Commission on Crime and Delinquency, *Baseline Criteria Standards for School Safety - Webinar Session*, January 2024.

Understanding and Applying the SSSC's Baseline Criteria

Importantly, the SSSC established two baseline criteria standards: (1) behavioral health and (2) physical security concerns within schools. These standards serve as a resource for schools to help determine their physical security and behavioral health needs, and they continue to drive much of the work of the SSSC.

The SSSC adopted the initial standards in 2021 following deliberations of a multidisciplinary baseline criteria workgroup. The criteria were later revised and updated in May 2023. Exhibit 17 lists areas included in the baseline criteria standards.

Exhibit 17

Behavioral Health and Physical Security Baseline Criteria Standards

Behavioral Health Baseline Criteria	Physical Security Baseline Criteria
• Student Assistance and Behavioral Health Support Assessment • Student Assistance Program • Mental/Behavioral Health Personnel and Services • School Climate • Staff Training • Trauma-Informed Approach Plan • Threat Assessment and Management	• Physical Security Assessments • School Campus, Building, and Classroom Security • School Security Personnel and Law Enforcement • Communications • Coordination with First Responders and Emergency Operation Plans (EOPs) • School Safety and Security Training/Drills

Source: Developed by LBFC staff from information obtained from PCCD.

In general, school entities must comply with the minimum requirements in both behavioral health and physical security baseline criteria standards. The baseline criteria standards refer to these minimum requirements as "Level 1" standards. Once the Level 1 requirements have been met, school entities may choose to follow advanced school safety and security standards (e.g., Level 2 and Level 3 standards) outlined in the criteria.

Behavioral Health Baseline Criteria. The behavioral health baseline criteria require a student assistance and behavioral health

support assessment to be conducted on a school building that is representative of the school entity.[68] Once this requirement has been met, the school entity may conduct this assessment at each educational level (elementary, middle, and high) and later for every school in the school entity.

School entities must also conduct threat assessments under the behavioral health baseline criteria. At Level 1, each school entity must have established at least one threat assessment team and developed policies and procedures regarding assessing and intervening with students displaying threatening behavior. At higher levels, these threat assessment efforts become increasingly coordinated with other school-based processes and policies (e.g., Safe2Say), community-based partners (law enforcement), and threat assessment teams become integrated within a comprehensive multi-tiered system of support.

The baseline criteria include the establishment of a Student Assistance Program (SAP), which aims to assist in identifying issues that pose a barrier to a student's success, including alcohol, tobacco, other drugs, and mental health issues. The PA Network for Student Assistance Services oversees the program, and it comprises representation from the state's Department of Education, Department of Drug and Alcohol Programs, and Department of Human Services.[69] The baseline criteria require that each school entity has a process to coordinate SAP services and referrals. Once established, the school entity may opt to add additional responsibilities for its SAP teams, such as directing them to work closely with SAP liaison agencies, coordinate with community providers of behavioral health services, and be trained to coordinate other school-based processes and policies (e.g. Act 71 suicide prevention). At Level 3, the school entity may also include representative liaisons from behavioral/mental health service providers in its SAP team and regularly evaluate its SAP process through inputs from both key internal and external stakeholders.

Under the baseline criteria, the establishment and maintenance of mental and behavioral health services and personnel are required. Specifically, each school entity must install a plan to connect students to behavioral and mental health resources, including school nurses, counseling programs, qualified psychologists, and social work services. The availability of these resources becomes more widespread as school entities advance up baseline criteria levels.

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[68] More information regarding the student assistance and behavioral health support assessment can be found in Section IV.

[69] *See* https://www.pa.gov/en/agencies/dhs/resources/for-residents/student-assistance-program.html, accessed December 10, 2024.

The baseline criteria also require that each school entity develop a trauma-informed approach plan.[70] Level 2 standards require this plan to be developed for each school level, and Level 3 standards require this plan to be developed, adopted, implemented, and monitored school entity-wide that addresses each school level.

The baseline criteria provide standards related to school climate that school entities must follow. For example, Level 1 requirements include conducting surveys related to school climate, providing age-appropriate prevention education, and training employees on topics related to student safety and well-being. In addition, each school must maintain policies and procedures that comply with federal and state civil rights requirements. School entities must also have policies and procedures that address bullying incidents and the appropriate student use of technology and social media. Once the school entity fulfills the Level 1 requirement, it may expand its efforts to cater to students at different levels. Other Level 3 standards include directing school entities to implement school entity-wide bullying prevention programs and gathering inputs from teachers, administrators, students, and parents/families to evaluate better the school entity's social media and technology policies and procedures.

In addition to the behavioral health baseline criteria requirements, school entities must have specialized staff training programs for de-escalation techniques and appropriate responses to student behavior that may require immediate intervention. At higher levels (i.e., once Level 1 standards are met), school entities may have all school professional staff and other support staff trained with these modules.

Physical Security Baseline Criteria. The physical security baseline criteria identify a series of standards for school entities that primarily relate to campus security infrastructure and communication systems. The criteria require that at least a physical security assessment be conducted on a school building that is representative of the school entity. At higher levels, this assessment can be conducted on all school buildings and large gathering spaces, as well as ancillary areas of the school facilities. This assessment can be performed by a qualified external assessor, such as the State Police's RVAT unit or an individual listed in the School Safety and Security Committee's Provider Registry (see Section IV for further information on these topics).

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[70] According to the Pennsylvania Commission on Crime and Delinquency, a trauma-informed approach "includes a school-wide approach to education and a classroom-based approach to student learning that recognizes the signs and symptoms of trauma and responds by fully integrating knowledge about trauma into policies, professional learning, procedures and practices for the purposes of recognizing the presence and onset of trauma." Act 18 of 2019 established a provision related to the creation of a trauma-informed approach plan. For more information, *see* Pennsylvania Commission on Crime and Delinquency, *Model Trauma-Informed Approach Plan: Guidelines for School Entities*, August 2019.

The criteria outline fundamental infrastructure requirements for school entities relating to maintaining and enhancing their physical security. Exhibit 18 provides a list of physical security features that each school entity must have at minimum (Level 1) in accordance with the criteria standards.

Exhibit 18

Baseline Criteria Physical Security Infrastructure Requirements*

Vehicle barriers/fencing of entrances and/or critical areas

Exterior lightning of entrances and critical areas

External, protective doors with viewing pane

Door handles that cannot be barred

A school visitor buzz-in entry system that allows for visual observation, including a documented log of school visitors and packages

Interior doors that can be locked from within each room

Working locks on all exterior doors

Cameras in blind spot areas

Single entry in and out of each school building during school hours

Note:
*/ This exhibit pertains to Level 1 requirements of physical security baseline criteria standards. This exhibit does not cover requirements relating to policies and/or procedures that school entities must adopt pursuant to Level 1 requirements of Section B in physical security baseline criteria standards.
Source: Developed by LBFC staff from Section B (School Campus, Building, and Classroom Safety) of PCCD's 2023 Physical Security Baseline Criteria Standards.

School entities must have physical security features that meet the criteria's Level 1 standard, such as exterior lighting of entrances and critical areas, working locks on all exterior doors, and cameras in blind spot areas. In addition, school entities must have policies and procedures for handling school visitors and packages and flagging immediate security concerns/risks.

The criteria also require school entities to have policies/procedures that educate students, staff, school visitors, and other authorized individuals on the importance of keeping exterior doors closed and secured. Once these Level 1 requirements are met, school entities can proceed to level 2 and level 3 standards, which include, but are not limited to, installing and maintaining speed controls in entrances and other critical areas; tampering and vehicle protection barriers; backup power support; emergency lighting; vestibules for main entry points; remote lock for doors; school visitor management system; impact-resistant doors; closed-circuit television (CCTV); alarm activation system; and intrusion detection device.

The criteria direct school entities to cooperate with law enforcement and security personnel on security matters and incidents. At Level 1, a school entity must have an active memorandum of understanding with each law enforcement agency with jurisdiction and associated policies and procedures. If a school entity has school security personnel (e.g. school police officers, school resource officers, and/or school security guards) present in its facility, they must have been hired or contracted and trained by requirements listed under the Public School Code. At Level 2, school entities can coordinate with local law enforcement agencies with jurisdiction around planning, incident response time, and other security issues and designate school security personnel at each school level. At Level 3, school entities can conduct regular training with local law enforcement and designate full-time school security personnel at each school building.

In addition to physical security and security personnel requirements, the criteria require each school entity to have communication systems in case of incidents affecting school safety and security. Specifically, at minimum, each school entity must have working mechanisms to promptly communicate with potentially affected individuals within and outside the building when necessary. At Level 2, school entities may choose to expand their communication system, such as establishing a two-way communication system between the main office, classrooms, and school staff, and utilize communication systems/devices that can address those with hearing impairments and/or overcome high-noise environments. At Level 3, school entities may implement communication systems that allow all school buildings to communicate with the administration building and law enforcement, develop a backup plan for communication systems in the event of the primary system being compromised, and pilot a mass

communication platform capable of communicating with all stakeholders/stakeholder groups and parents/guardians in the case of an emergency.

The criteria identify readiness measures for school entities to ensure that they can handle and respond to emergency situations. At a minimum, school entities are required to adopt an emergency preparedness or emergency operations plan (EOP), as well as a communication and reunification plan. School entities must also coordinate and share their updated emergency preparedness plans/EOPs with the Emergency Management Agency in their respective counties. At higher levels, school entities may choose to adopt emergency preparedness plans that address the needs of students with special needs, review (and update as necessary) EOPs on an annual basis, and prepare for immediate deployment to the Incident Command Post with all required information to assist local police and fire departments in responding to an emergency situation. School entities may also train all staff on and inform students, parents, and others of the emergency preparedness plans and what to do in an emergency. Other emergency preparedness efforts may include tabletop exercises or similar drills in collaboration with local first responders regularly on areas related to prevention, protection, mitigation, response, and recovery.

Finally, physical security baseline criteria include components related to school safety and security training and drills. The criteria require that, at minimum, all school entity employees receive annual training on school safety-related topics. Once schools satisfy this requirement, they may expand their existing training efforts. For example, they could train all leadership team members to the National Incident Management System (NIMS)[71] standards and have their administrators participate in at least one tabletop exercise per year. Schools may offer specialized training (e.g. CPR, AED, Stop the Bleed) for their staff or develop a specific robust training calendar with identified dates and topics for ongoing school safety training. Schools may also invite community first responders to participate in school safety-related professional development activities.

Revisions to Baseline Criteria Standards. The baseline criteria standards were last revised in May 2023. The revisions included the following:[72]

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[71] National Incident Management System is a comprehensive, national approach to incident management that is aimed at guiding all levels of government, nongovernmental organizations, and the private sector to work together to prevent and respond to incidents. For more information on NIMS, see Federal Emergency Management Agency, *National Incident Management System - Third Edition*, October 2017.

[72] Pennsylvania Commission on Crime and Delinquency, *Baseline Criteria Standards for School Safety - Webinar Session*, January 2024.

- **Updated the terminology from "tiers" (Tier 1, Tier 2, and Tier 3) to "levels" (Level 1, Level 2, and Level 3).** This update is intended to reduce confusion with other types of models that are used by school entities, such as multi-tiered systems of support.

- **Re-evaluated and revised Level 1(formerly "Tier 1") criteria.** This change was updated based on common gaps and feedback provided by school entities during the initial grant process for the 2022-2023 School Safety and Mental Health Grants. This update was also meant to make Level 1 criteria more closely aligned with existing statutory requirements and mandates that school entities must follow in accordance with federal and state laws. The 2023 standards include references to these requirements/mandates throughout the documents.

- **Established a new option for school entities to use grant funds towards critical gaps identified through professionally completed assessments.** The SSSC adopted this revision to recognize that the baseline criteria standards might not explicitly cover some critical basic needs that may be identified through an assessment.

- **Reframed the baseline criteria to acknowledge the different nature and contexts of different school entities in Pennsylvania.** Specifically, the 2021 standards did not exactly have practical application for different types of school entities (including cyber schools), such as physical security features (e.g. fencing around play areas) that were not necessarily applicable to career and technical centers. Thus, the criteria standards were updated to ensure that the criteria are more universal, especially at Level 1

- **Expanded flexibility for school-based mental health services and supports that meet the baseline criteria.** Previously, school entities expressed concerns about the challenges of finding people (e.g., psychologists) to support their mental health services, especially in rural communities. The criteria standards were updated to emphasize access to qualified mental and behavioral health personnel and services/supports as Level 1 criteria.

- **Reference new requirements for school entities, such as Act 55 of 2022 and best practices that subject-matter experts and educational practitioners from the field identified.** Act 55 of 2022 requires school entities to use the School Safety and Security Grant Program funding toward complying with Level 1 standards of the baseline criteria first before using the grant monies for other school safety and security-related activities (e.g. Level 2/3 standards). This provision came into effect with the

2022-23 school year. Act 55 of 2022 modified the training requirements for all school employees to include three hours annually in specific topics based on the SSSC's adopted standards.

Federal School Safety Standards

Over the years, states have become increasingly more involved in crafting their own safety and security requirements for schools. However, the federal government has previously piloted grant programs to support schools in meeting their safety and security needs,[73] and it also has published recommendations that states and schools may choose to adopt.[74]

In 2020, the School Safety Working Group of the United States Department of Justice's Office of Community-Oriented Policing Services (COPS) published a report containing ten recommended actions for improving school safety.[75] To better evaluate how Pennsylvania's baseline criteria standards compare to the federal government's recommendations on school safety, we compared SSSC's physical security and behavioral health criteria standards to recommendations listed in COPS' report. Exhibit 19 illustrates this comparative analysis.

Exhibit 19

School Safety Working Group Recommendations for Physical Safety*

Recommended action	Included in Pennsylvania's baseline criteria?	Where is it covered in the baseline criteria?
Comprehensive school safety assessment	Yes	Physical Security Assessments (PS); Threat Assessment and Management (BH); Student Assistance and Behavioral Health Support Assessment (BH)
Campus, building, and classroom security	Mostly yes (*see* discussion for additional details)	School Campus, Building, and Classroom Security (PS); Physical Security Assessments (PS)
Coordination with first responders	Yes	Coordination with First Responders & Emergency Operations Plans (PS)
School-based law enforcement	Yes	School Security Personnel & Law Enforcement (PS)
Drills	Yes	School Safety and Security Training/Drills (PS)

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[73] For more information on federal programs and initiatives relating to school safety and security, *see* Dragoo, Kyrie E. et al., *Federal Support for School Safety and Security*, Congressional Research Service, June 15, 2022.

[74] Other federal reports outlining recommendations for/relating to school safety and security include, but are not limited to, (1) Federal Commission on School Safety, *Final Report of the Federal Commission on School Safety*, December 18, 2018, and (2) United States Secret Service, Averting Targeted School Violence, *A U.S. Secret Service Analysis of Plots Against Schools*, March 2021.

[75] United States Department of Justice's Office of Community Oriented Policing Services' School Safety Working Group, *Ten Essential Actions to Improve School Safety - School Safety Working Group Report to the Attorney General*, 2020.

Exhibit 19 Continued

School Safety Working Group Recommendations for Emotional Security

Recommended action	Included in Pennsylvania's baseline criteria?	Where is it covered in the baseline criteria?
School climate	Yes	School Climate (BH)
Anonymous reporting systems	The Pennsylvania Office of Attorney General oversees an anonymous tipline system, Safe2Say Something.	-
Behavior threat assessment and management	Yes	Student Assistance & Behavioral Health Support Assessment (PS); Threat Assessment and Management (BH)
Mental health resources	Yes	Student Assistance Program (BH); Mental/Behavioral Health Personnel and Services/Supports (BH)
Social media monitoring	Somewhat (*see* discussion for additional details).	School Climate (BH)

Note:
*/In the third column, references to the behavioral health baseline criteria are labeled "BH" in parentheses, and those referring to the physical security baseline criteria are labeled "PS" in parentheses.
Source: Developed by LBFC staff from United States Department of Justice's Office of Community Oriented Policing Services' School Safety Working Group, *Ten Essential Actions to Improve School Safety - School Safety Working Group Report to the Attorney General*, 2020.

As shown in the exhibit above, we found that the baseline criteria standards fulfilled most of the recommended actions from the COPS School Safety Working Group. However, a few components of COPS' recommendations were not explicitly mentioned in Pennsylvania's baseline criteria standards.

For example, the COPS report recommended schools implement social media monitoring systems. Specifically, the report suggested that "defensive social media monitoring," also called social media alerting systems, be used. These systems provide constant online scanning of messages within a geofence around a school to identify threats and at-risk behavior, including cyberbullying. Pennsylvania's behavioral health baseline criteria standards had language relating to policies/procedures for addressing appropriate student use of technology and social media. Still, there was no explicit reference that directed schools to implement instruments for social media monitoring purposes.

The security infrastructure requirements in Pennsylvania's physical security baseline criteria standards also fulfilled most of the recommended actions listed in the COPS report. Among a list of COPS recommendations relating to campus, building, and classroom security in schools, the COPS report recommended that schools designate "secure, uncluttered safe spaces called 'hard corners' in every classroom where students will

be safe from projectiles fired into the classroom from outside." Physical security assessments, which schools are required to complete as per the baseline criteria, do have specific measures[76] relating to security features in classrooms, but there is no explicit reference that requires schools to designate safe spaces or "hard corners" in every classroom.

Grant Administration and Standards Used in Other States

As part of our procedures, we compared Pennsylvania's baseline criteria standards to key school safety and security standards in five other states, especially their respective grant administration processes. The five states we reviewed were:[77]

- Georgia
- Florida
- Texas
- Ohio
- Virginia

Our analysis examined school safety and security-oriented grant opportunities for schools in the selected states and the corresponding fund-use guidelines. Exhibit 20 provides an overview of the state agencies overseeing school safety and security standards and examples of their grant programs.

Exhibit 20

School Safety and Security Oversight in Selected States*

State	Responsible Agency(ies)	Examples of Grant/Funding Opportunities
Georgia	• Georgia Department of Education (GADOE) • Georgia Emergency Management and Homeland Security Agency	• School Security Grants (GADOE) • Safer Georgia Schools Grant (GADOE)
Florida	• Florida Department of Education's (FLDOE) Office of Safe Schools	• Safe Schools funding via the General Appropriation Acts (FLDOE) • School Hardening Grant Program (FLDOE) • Mental Health Assistance Program (FLDOE)

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[76] Based on the physical assessment criteria from Pennsylvania Commission on Crime and Delinquency, *Physical Assessment Criteria – Tiered Approach*, October 3, 2024.

[77] We have selected these states based on the suggestions from PCCD and the history of school safety/security-related incidents in the United States (e.g., school shootings). We attempted to reach relevant agencies for school safety in Virginia and Florida to inquire about their school safety grants but did not hear back.

Ohio	• Ohio Department of Public Safety's School Safety Center (OSSC)	• School Safety Grant (Ohio Attorney General's Office) • School/Law Enforcement Technology Linking Grant (Ohio Attorney General's Office) • K-12 School Safety Grant Program (Ohio Facilities Construction Commission and OSSC)
Virginia	• Virginia Department of Education (VADOE) • Virginia Department of Criminal Justice Services' (VDCJS) Center for School and Campus Safety	• School Construction Assistance Program (VADOE) • Security Equipment Grants (VADOE) • School Safety and Security Grant (VADOE) • School Safety Personnel and Programming Grant (VDCJS)
Texas	• Texas Education Agency (TEA) • Texas School Safety Center	• School Safety Standards Formula Grant (TEA) • Silent Panic Alert Technology Grant (TEA) • School Safety and Security Grant (TEA) • Safety And Facilities Enhancement Grant (TEA)

Source: Developed by LBFC staff from information published by respective state agencies.

In our research, we found that some state grant programs require evaluations to determine whether a school needs funding to support its safety and/or security needs. In contrast, others require entities to hit certain thresholds to qualify for funding. For example, applications for the 2022 Ohio K-12 School Safety Grant Program and Virginia's 2022-2024 Biennium School Construction Assistance Program are scored in their respective evaluation processes.[78] As we discussed previously, in Pennsylvania, school entities may qualify for grant funding for Level 1 standards first. Once these standards are met, grant funding may be used for Level 2 or 3 standards, or from other expressly cited purposes as allowable under the Public School Code [section 1306-B(j).

Georgia. Georgia's school safety and security guidelines are jointly governed and enforced by the Georgia Department of Education (GADOE) and the Georgia Emergency Management and Homeland Security Agency. Schools must comply with the standards outlined in the Official Code of Georgia and guidelines put forth by these agencies.

GADOE offers primarily state and federally funded grant programs to address school safety and security issues. For example, in 2023, GADOE coordinated the Safer Georgia Schools Grant, which was funded by the United States Department of Education and aimed at helping schools support their students' health and safety.[79] The grant program required that schools clearly articulate funding needs to support students' health

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[78] For more information on the 2022 Ohio K-12 School Safety Grant Program, *see* Ohio Facilities Construction Commission, *Evaluation Guide for 2022 Ohio K-12 School Safety Grant Program Applicants,* August 2022. For more information on Virginia's 2022-2024 Biennium School Construction Assistance Program, *see* Virginia Board of Education, *Guidelines for Implementing the School Construction Assistance Program in the 2022-2024 Biennium*, February 2023.
[79] Use of the funds must fall under a list of activities authorized under Section 4108 of the federal Elementary and Secondary Education Act.

and safety. The applications for this grant program were scored on a 52-point scale. As part of the application and scoring process, schools had to provide a description of the intended outcomes of grant funding, demonstrate an intent to collaborate with at least three relevant community stakeholders, and submit at least two letters of support from key stakeholders (e.g., local law enforcement), among others.[80]

Further, for fiscal year 2025, the Georgia General Assembly allocated $108.9 million for school security grants. All schools will be receiving $47,124 through district allocations with no conditions.[81] This funding was designed to help schools address their school security needs, such as safety infrastructure (e.g., safety lightning), safety training, the development of school safety plans, and school resource officers.[82]

Florida. The Florida Department of Education's (FLDOE) Office of Safe Schools coordinates school safety and security guidelines and initiatives.[83] The state implemented a series of school safety and security measures into law and agency rules following the enactment of the Marjory Stoneman Douglas High School Public Safety Act (Senate Bill 7026) in 2018.[84]

School districts receive funding from the FLDOE's Safe Schools program to comply with student discipline and school safety provisions[85] in the Florida Statutes. Priority is given to establishing a school resource officer program. The state's General Appropriations Act provided $250 million for Safe Schools activities in the 2023-2024 fiscal year, with each school guaranteed to receive a minimum of $250,000. In addition, Florida provides mental health funding to schools through Mental Health Assistance Allocations. For the 2023-2024 school year, a total of $160 million was available to help establish or expand school-based mental health care, with each school district receiving a minimum of $100,000.[86]

Additionally, Florida had previously established the School Hardening Grant Program to allocate non-recurring funds to school districts to help improve the physical security of school buildings. This grant program

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[80] Georgia Department of Education's Office of Whole Child Supports, *Safer Georgia Schools Grant 2023-2025*, May 2, 2023.

[81] https://www.gadoe.org/wholechild/Pages/default.aspx, accessed September 20, 2024. For fiscal year 2025, 2,311 schools, 24 Georgia Network for Educational and Therapeutic Supports (GNETS) programs, and three state schools will be receiving this grant funding. The Georgia Department of Education also provided additional clarification regarding this grant program via email on September 19, 2024.

[82] Georgia Department of Education's memorandum from May 21, 2024, to superintendents, student services directors, and school safety coordinators on the fiscal year 2025 school security grants.

[83] In addition to resources provided by the Florida Department of Education's Office of Safe Schools, the Florida Administrative Code, such as Rule 6A-1.0018 (School Safety Requirements and Monitoring), and the Florida Statutes listed forth also identify school safety requirements that school entities must comply with.

[84] This law was enacted following the Parkland High School shooting in February 2018.

[85] The funding can be used to comply with ss. 1006.07 through 1006.12 of the Florida Statutes.

[86] Information based on Florida Department of Education, *2023-24 Funding for Florida Schools Districts*.

had eligibility requirements for schools, requiring that proposed expenditures for projects funded via this program must follow FLDOE's criteria standards. Specifically, the grant program required that the proposed projects/expenditures must be:[87]

- Allowable: Items must be physically attached to school property.
- Appropriate: Associated with improving physical safety and security of school buildings.
- Identifiable: Identified by a security risk assessment (Florida Safe Schools Assessment Tool) as a need and the School Hardening Needs Report submitted by the district.
- Used to or for augmenting existing security features.
- Used for items other than code compliance deficiencies.

Some of the examples of eligible projects/expenditures that a school district may pilot through the grant program include fencing and gates, entryways, door and window hardening, and video surveillance.

Ohio. The Ohio School Safety Center (OSSC), housed under the state's Department of Public Safety, is primarily responsible for school safety and security initiatives in Ohio. OSSC has previously partnered with other government agencies and community organizations in its school safety and security efforts. For example, in 2022, OSSC, in partnership with the Ohio Department of Education, Ohio Department of Mental Health and Addiction Services, and the Ohio Attorney General's Office (OHOAG), developed the Ohio School Behavioral Threat Assessment Model Policy pursuant to House Bill 123.[88]

In Ohio, there is a wide range of grant programs governed by different agencies. For example, OHOAG, the Ohio Bureau of Workers' Compensation, and OSSC have their own school safety/security grant programs. Among a list of grant opportunities in the state, OSSC and the Ohio Facilities Construction Commission (OFCC) lead the state's K-12 School Safety Grant Program, which is a competitive grant program that schools can apply for to help fund their physical security expenses (e.g. new security cameras, automatic door locks, and exterior lightning). In 2022, the grant program provided up to $100,000 for eligible school buildings, and applications for the program were reviewed and scored in accordance with OFCC's evaluation guide on a 15-point scale. While there were no stipulations regarding how many points a school needs to earn the grant funding, the evaluation guide indicated that "any application receiving a significant number of zeros in any scored sections may be rejected" at

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[87] The requirements were listed forth in FLDOE's memorandum to school district superintendents and finance officers on November 14, 2023, regarding the School Hardening Grant Program.
[88] Ohio School Safety Center, *2022 Annual School Safety Report*.

the sole discretion of the OFCC staff.[89] The evaluation criteria required schools to (1) conduct and submit the Security and Vulnerability Assessment developed by OSSC and OFCC, (2) describe how the requested funding will address the needs identified in their vulnerability assessment, and (3) confirm the school building's county location for Centers for Disease Control and Prevention's Social Vulnerability Index.[90]

Other grant opportunities the state provides include, but are not limited to, OHOAG's School Security Grants and School/Law Enforcement Technology Safety Grants. OHOAG's School Security Grants aim to support schools' safety planning, training, and classroom programs (e.g. active-shooter response training), while its School/Law Enforcement Technology Linking Safety Grants assist schools in implementing crisis-response or prevention technology (e.g. silent panic alarms) designed to alert law enforcement of potential safety breaches on school property.

Virginia. The Virginia Department of Education (VADOE) and the Department of Criminal Justice Services' (VCDJS) Center for School and Campus Safety are the primary oversight agencies for school safety and security guidelines, including school safety audits.

Virginia offers school safety and security-related grant programs through VADOE. The School Safety and Security Grant, for example, provides grant funds to public schools to help fund their school safety and security needs, such as equipment purchases and installations, software purchases, planning, and on-site training to improve the safety and security of school buildings.[91] For fiscal year 2024, the state provided $18.5 million in state and federal funding for the grant program, and VADOE awarded each school division a base funding of $50,000. The remainder of the grant funds were distributed to school divisions based on their scores on the allocation criteria. The allocation criteria include a unique mixture of factors, including the following:[92]

- Local composite index.
- School division's PK-12 enrollment as of September 30, 2023.
- Number of school buses in the division from VADOE records.
- Number of public school buildings and facilities reported by divisions on the May 2024 school security survey.

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[89] Ohio Facilities Construction Commission, *Evaluation Guide for 2022 Ohio K-12 School Safety Grant Program Applicants*, August 2022.
[90] Ibid.
[91] Virginia Department of Education, *FY 2024 School Safety and Security Grant*.
[92] Information based on Virginia Department of Education, *Guidelines for FY 2024 School Safety and Security Grants (One-time Grant)*.

- Average percentage of school buildings/facilities in the division with nine safety/security components present in the building/facility as reported by divisions on the May 2024 school security survey.

Other grant programs in Virginia include the School Construction Assistance Program and the School Security Equipment Grants Program. The School Construction Assistance Program is designed to award grants on a competitive basis to local school boards that "demonstrate poor building conditions, commitment, and need for such local school boards to be able to fund the construction, expansion, or modernization of public school buildings."[93] Proposed school projects seeking grant funding from the program must comply with VADOE's *Guidelines for School Facilities in Virginia's Public Schools*.[94] Proposed school projects must earn a total qualifying criteria score of at least 65 points on a 100-point scale to qualify for grant awards. The criteria are developed by the Virginia Board of Education and are broken into the following three categories: [95]

- **Commitment**. The local governing body must agree to maintain or increase the percentage of local revenues dedicated to public education throughout the financing proposed for the project. Further, the project design and site acquisition must be completed before applying for grant funds.

- **Need**. This criterion is evaluated based on the financial and economic conditions of the local school division and its locality.

- **Poor school building conditions**. This criterion evaluates the condition of the facilities proposed to be replaced, such as their potential threat to the health or safety of building occupants.

Additionally, the grant money is distributed to school divisions based on their level of fiscal stress. According to the Virginia Commission on Local Government, the "fiscal stress index illustrates a locality's ability to generate additional local revenues from its current tax base relative to the rest of the Commonwealth."[96] School divisions with greater fiscal stress may receive more funding to cover a larger portion of their approved project costs than those with lower fiscal stress.

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[93] Virginia Board of Education, *Guidelines for Implementing the School Construction Assistance Program in the 2022-2024 Biennium*, February 2023.

[94] For more information, *see* Virginia Department of Education, *Guidelines for School Facilities in Virginia's Public Schools*, 2021.

[95] Virginia Board of Education, Guidelines for Implementing the School Construction Assistance Program in the 2022-2024 Biennium, February 2023.

[96] Virginia Commission on Local Government, *Report on Comparative Revenue Capacity, Revenue Effort, And Fiscal Stress of Virginia's Cities and Counties – FY 2021*, July 2023 (published via the Virginia Department of Housing and Community Development).

The School Security Equipment Grants Program also scores applications via criteria standards, though there are no specific stipulations relating to how many points a school must earn to receive the funding. Schools are scored on a 100-point scale, and it evaluates a wide range of topics relating to a school's existing safety and security features, such as its current physical security features, poverty level, Division Composite Index, and incident and offense data.

VDCJS also provides grant opportunities, especially for localities and law enforcement offices. The agency offers the School Safety Personnel and Programming Grant, which funds relevant school safety personnel within the school division or law enforcement agency and related expenses.[97]

Texas. The Texas Education Agency (TEA) and Texas School Safety Center (TSSC) govern school safety and security standards.[98] TEA collaborates with TSSC on a series of school safety and security issues, such as developing guidance and resources to establish a comprehensive threat assessment model.[99]

Similar to other states, Texas provides grant opportunities for school entities in the state to support their safety and security needs, which are primarily offered through TEA. In 2022, TEA announced the 2022-2025 School Safety Standards Formula Grant Program, which had $400 million available for distribution to local educational agencies (LEA). This grant was aimed at supporting LEAs in implementing and complying with the school safety standards listed forth in Title 19, Part 2, Chapter 61, Subchapter CC, Rule §61.1031 of the Texas Administrative Code. Allowable safety standards activities under this grant program included but were not limited to, procurement and installation of fencing, exterior doors, ground-level exterior windows, and silent panic alert technologies. Once LEAs satisfied the minimum requirements of the rule from the Texas Administrative Code, they were then permitted to expend the funding towards other school security-related activities, such as installing security cameras and equipment and conducting active shooter and emergency response training. TEA established the following program requirements that LEAs must follow to be considered for this funding opportunity:[100]

- LEAs must first expend all its School Safety and Security Grant/school hardening funds.

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[97] https://www.dcjs.virginia.gov/virginia-center-school-and-campus-safety/grants/school-safety-personnel-and-programming-grant, accessed November 21, 2024.

[98] The Texas School Safety Center is housed under the Texas State University. According to their website, they serve "as a clearinghouse for the dissemination of safety and security information through research, training, and technical assistance for K-12 schools and junior colleges throughout the state of Texas." For more information, *see* https://txssc.txstate.edu/about/, accessed January 6, 2025.

[99] https://tea.texas.gov/texas-schools/health-safety-discipline/safe-and-supportive-schools, accessed December 10, 2024.

[100] Texas Education Agency, *Program Guidelines - 2022-2025 School Safety Standards Formula Grant*.

- LEAs must expend the funds from this grant opportunity to meet minimum school safety standards pursuant to Title 19, Part 2, Chapter 61, Subchapter CC, Rule §61.1031 of the Texas Administrative Code,
- LEAs must comply with all intruder detection audit requirements.
- Only costs for the purchase and installation of security-related activities detailed in the list of allowable activities for this grant opportunity will be allowed to be charged to the grant.
- The grant funds from this grant opportunity will be monitored for programmatic and fiscal compliance during the grant period and potentially after the grant period.

Texas also previously allocated $17.1 million for its 2022-2024 Silent Panic Alert Technology Grant Program, which provided grant funds to LEAs to purchase silent panic alert technologies that can be used to signal life-threatening or emergency situations (e.g. presence of an active shooter on campus). To be considered for funding from the grant program, LEAs had to meet program requirements established by TEA. LEAs had to ensure they only used the grant funding for the purchase, installation, and annual maintenance/service contracts for silent panic alert technologies. While LEAs could use the grant funds to purchase comprehensive school safety software systems (e.g. visitor screening and safety drills), silent panic alert technology had to be the primary component (see also Section VI for more information about this requirement).

LEAs also had to implement a communications infrastructure, which must include a panic alert button, duress, or equivalent alarm system, that must have the following components in its functionality:[101]

- An alert capable of being triggered manually by campus staff.
- An alert is triggered automatically if a district employee calls 911 from any location within the school system.
- With any alert generated, the location of where the alert originated must be included.
- The alert must notify designated school administrators to confirm the response. If a response is confirmed, the notice must be issued to law enforcement and emergency responder agencies. A notice must also be issued simultaneously to all school staff regarding following appropriate emergency procedures.
- For any exterior doors with electric locking mechanisms that allow for remote locking, the alert system must trigger those doors to lock themselves automatically and notify relevant campus staff.

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[101] Texas Education Agency, *Program Guidelines - 2022-2024 Silent Panic Alert Technology (SPAT) Grant.*

TEA has also previously administered the 2024-2025 Safety and Facilities Enhancement Grant Program. This program was intended for LEAs certified as not complying with the state's school safety requirements. LEAs already complying with the adopted safety standards could use the grant fund for other security measures.

Other grant programs previously administered by TEA include the 2019-2021 School Safety and Security Grant Program, which allowed public schools to use grant funding for physical security infrastructure needs. The grant program did not have any specific program requirements.

In conclusion, state governments are crucial in providing schools with the tools and resources necessary to enhance safety and security. Our analysis of grants administered by the Pennsylvania Commission on Crime and Delinquency (PCCD) and our review of other state safety agencies shows that grants are vital for schools in meeting safety requirements established by state laws and guidelines. Further, because school entities often use grant funds for a wide range of allowable activities, this funding is often the most direct way for schools to meet the minimum thresholds for school safety security initiatives.

SECTION IV
SECURITY ASSESSMENTS

Overview

A critical aspect of school safety is conducting routine security assessments of school buildings and grounds. These security assessments are conducted by qualified individuals who have received training in critical infrastructure reviews and are familiar with the criteria and best practices to ensure school buildings are safe from possible threats. In Pennsylvania, school safety assessments can take varying forms, which are discussed throughout this section.

Act 44 of 2018 specifies three types of assessments, including:

- **Physical Assessment:** An assessment conducted to evaluate a school's facilities and surrounding property, in addition to a review of the school's existing safety and security plan, crisis response and mitigation plan, crime prevention policy, and discussions with local law enforcement and school personnel.

- **Policy and Training Assessment:** An evaluation of the school's policies and practices, such as student safety and security, student code of conduct, safety and security training and policies, and communication practices.

- **Student Assistance and Behavioral Health Support Assessment:** This assessment evaluates the school's climate, availability of student assistance programs, and the professionals administering the services students need.

To this requirement, assessments may be completed by either private entities at a cost to the school entity (grant funding is available), by the school entity staff, or by the Pennsylvania State Police (PSP) through its Risk and Vulnerability Assessment Team (RVAT), which are conducted at the PSP's expense. RVAT is an 18-member unit of troopers with specialized training in school security issues and assessment techniques. RVAT uses its assessment criteria to perform physical security assessments. This criterion is based on the criteria established by the SSSC but has been expanded due to RVAT's expertise. From 2018-19 through 2023-24, RVAT assessed 1,991 entities, of which 69 percent were public or private K-12 schools.

For those school entities that do not qualify to receive priority status for PSP RVAT assessments, Act 44 outlines a process by which the SSSC was to create criteria for school safety and security assessments. Initially established in the fall of 2018, the SSSC's criteria covered assessments in the physical and behavioral health domains, with policy and training requirements within each.

Assessments may be self-administered or conducted by certified school safety and security assessment providers, which were established under the SSSC's direction as a result of Act 44.

These efforts have significantly enhanced the understanding of the safety and security landscape for schools across the commonwealth. In its most recent survey of school entities during the 2022-23 academic year, PCCD reports that 91 percent of responding schools had completed a physical security assessment while 51 percent had submitted a behavioral assessment.

In addition to the information we obtained from the SSSC, we also worked with PCCD to conduct a brief survey of individuals listed on the state's School Safety and Security Provider Registry. While we found that the assessment criteria are generally well-received, we do make several recommendations in this issue area to enhance the provider registry and overall assessment process moving forward.

Issue Areas

A. PSP RVAT Assessments

In 2004, the Pennsylvania State Police (PSP) established the Risk and Vulnerability Assessment Team (RVAT) to conduct in-depth security vulnerability assessments of physical facilities and operational procedures and provide recommendations to improve the security of any public or private facility within the commonwealth. Act 44 of 2018 required PSP to establish three RVATs using existing PSP appropriations. Further, per Act 44, each RVAT comprises a minimum of three troopers in three PSP-defined geographical regions.[102] While the RVATs primarily conduct security assessments of schools, they also assess other public buildings,

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[102] Act 2019-18 further divided the commonwealth into six region sections. In response to Act 2019-18, PSP added one part-time alternate RVAT member to fifteen troops, increasing the number of RVAT members from 18 to 33. The alternate members received their work assignments directly from the corporal in charge of their region. Between FY 2022-23 and FY 2023-24, RVAT stopped using part-time members because it was inefficient.

critical infrastructure sites, and houses of worship.[103] In this area, we will discuss RVAT, including its geographic distribution, training requirements for PSP RVAT members, assessment criteria used, the number of assessments completed, and projected backlogs.

RVAT Regions

As illustrated in Exhibit 21, to meet the requirements of Act 44, the PSP has divided the state into west, central, and east regions and further into northern and southern regions within each respective area. As a result, there are six defined regions in which RVAT operates. A corporal is responsible for the RVAT in each region's northern and southern sections. A sergeant at PSP Headquarters in Harrisburg is responsible for the three regional corporals. As of the 2024 Commissioner's RVAT report, there are 18 RVAT members. The RVAT members are included in the PSP statutory complement cap of 4,410 enlisted members.[104]

Exhibit 21

RVAT Regions
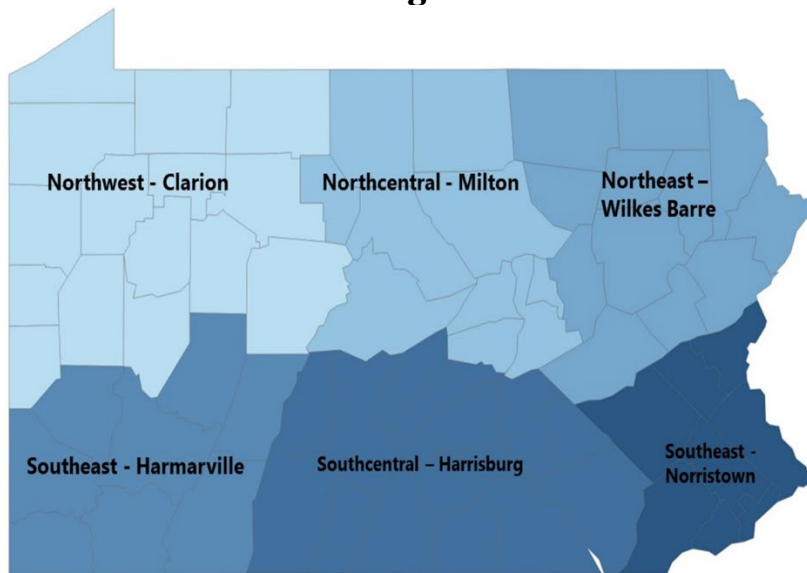
Source: Developed by LBFC staff from PSP provided information.

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[103] Critical infrastructure sites, as defined by the 2013 National Infrastructure Protection Plan, can be government facilities or other non-government organizations that fall under chemical facilities, commercial facilities, communications, critical manufacturing, dams, defense industry, emergency services, energy, financial services, food and agriculture, government facilities, healthcare and public health, information technology, nuclear reactors, materials, and waste, transportation systems, water and wastewater systems.
[104] Act 2023-34 increased the statutory PSP complement cap by 100, the first increase since 2001. PSP officers and enlisted members serving with the Pennsylvania Turnpike Commission, Delaware River Joint Toll Bridge Commission, Gaming Enforcement, and Liquor Control Enforcement are excluded from the statutory complement cap.

RVAT Member Training

According to PSP officials, training for RVAT members is continuous due to the changing nature of security issues. The RVAT uses various training opportunities throughout the year to remain current with the ever-changing threat trends and assessment techniques and expand their knowledge base and skills in physical security and related topics. As a result, training requirements for PSP members conducting RVAT assessments must be factored in when evaluating the capacity for completing assessments.

PSP officials we spoke with noted that classes and conferences are held by various entities ranging from private entities, the Federal Emergency Management Agency, the United States Department of Homeland Security, the Governor's Office of Homeland Security, the Cybersecurity and Infrastructure Security Agency, delegates of said agencies, or combinations thereof. Courses are funded federally through grants or PSP funds. RVAT seeks training through networking, distribution lists, and basic searching. From FY 2020-21 to FY 2023-24, the RVAT incurred an average of $12,235 per year in training costs.[105]

RVAT members participate in ongoing training from qualified training providers. Past training opportunities included classes such as:

- Infrastructure Protection Certificate Program (five classes) from Texas A&M Engineering Extension Service.
- Bomb Prevention Awareness – Center for Domestic Preparedness (CDP).
- Bomb Threat Awareness (CDP).
- Barrier Precautions & Controls (CDP).
- Bomb Threat Assessment (CDP).
- Bomb Threat Preparedness & Response (CDP).
- Understanding and Planning for School Bombing Incidents (New Mexico Tech).
- Training through Readiness and Emergency Management for Schools/Center for Safe Schools.

According to the PSP, all members of RVAT have completed the Federal Law Enforcement Training Center (FLETC) training program.[106] As of Oc-

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[105] In an October 2024 email exchange on the cost of training, an RVAT representative explained that due to the increased cost and variety of training (type of training not provided), a change in personnel, and how training is tracked, total cost data for training is only available for 2021-24. The RVAT representative further explained that he took the total cost of training for each year and averaged it to get a general idea of the cost of training for the unit per year.
[106] The FLETC provides law enforcement training for federal, state, local, and tribal agencies.

tober 2024, 13 members of RVAT were ASIS certified, with six certifications pending.[107] PSP also informed us that all new RVAT members must meet the requirements that follow:

1. A new member must accompany an experienced RVAT member for at least three assessments, observe at least two assessments, and conduct one assessment.

2. New members must also attend and complete the two-week Physical Security Training Program the Federal Law Enforcement Training Center (FLETC) provides.

3. Within 18 months of joining the unit, members must obtain an ASIS International Physical Security Professional Certification.

RVAT Assessment Process and Prioritization

Assessments are performed when the school is in session and take approximately two days to complete depending on the size of the school. Per PSP at a recent House of Representatives Education Committee Hearing in October 2024, assessments aim to "identify critical assets and vulnerabilities to a wide range of potential threats."

Before conducting an assessment, the RVAT sends the School Safety and Security Coordinator a pre-assessment survey to complete and return to the RVAT assessor. During the assessment, the RVAT member meets with school personnel. Once the assessment is complete, the RVAT assessor prepares and provides the school with a written report identifying deficiencies and making recommendations for improvement.

By law, the PSP must prioritize RVAT assessments based on a school entity's market value/income aid ratio. Those schools with smaller tax bases receive priority for an RVAT assessment.[108] The market/value ratio is set by the Pennsylvania Department of Education (PDE).

Assessment Criteria

Per Act 44, the SSSC establishes criteria to assist schools in safety and security assessments. This requirement is somewhat circular because the

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[107] This certification is awarded by ASIS International, an organization for security professionals. It is designed for those who are responsible for physical security of buildings and people and covers physical security assessment, application, design and integration of security systems, and implementation of security measures.
[108] For houses of worship or critical infrastructure, priority is primarily based on when the request was made. However, certain events, venues, or infrastructure may take priority, based upon current information, active events or incidents.

SSSC relies on the PSP RVAT expertise to inform its assessment criteria. We reviewed both the SSSC assessment criteria and the PSP RVAT criteria, and while each is similar, the PSP criteria were generally more specific. For example, RVAT criteria mention site-specific criteria such as securing rooftop access points to deter unauthorized entry or exit. In contrast, SSSC is less specific in its exterior criteria and does not mention rooftop access. Because the criteria are sensitive information, we are not releasing further details in this report. However, both criteria, PSP RVAT and SSSC provide an important first step in assessing school vulnerabilities.

When conducting an assessment, the RVAT assessor reviews several criteria regarding the physical aspects of a building and surrounding grounds. Assessment criteria cover a school building's external and internal bodily environment, climate, policies, procedures, and training. Importantly, RVAT does not conduct behavioral health assessments.

While RVAT does not have a set timeline for reviewing and revising its criteria, it does so regularly to incorporate new best practices and findings. The SSSC is statutorily required to review and revise its school safety and security physical assessment criteria every three years. The last SSSC review and revision took place in 2021.

Number of Completed RVAT Assessments

As shown in Exhibit 22, from FY 2018-19 to 2023-24, the RVAT assessed 1,991 entities, 1,374 (69 percent) of which were public or private K-12 schools.[109]

RVAT has performed fewer K-12 public and private school assessments in recent years. Specifically, in FY 2021-22, RVAT completed 373 K-12 assessments, whereas in FY 2023-24, RVAT only completed 193 K_12 assessments. According to the PSP, during this study's review period, the RVAT experienced several vacancies due to promotion, transfer, and retirement. Because of these reasons, other RVAT members temporarily assumed supervisory duties, reducing the number of assessments RVAT could complete. Per an RVAT official, a vacancy occurred in RVAT in late November. However, PSP has posted the vacancy and hopes to fill it soon.
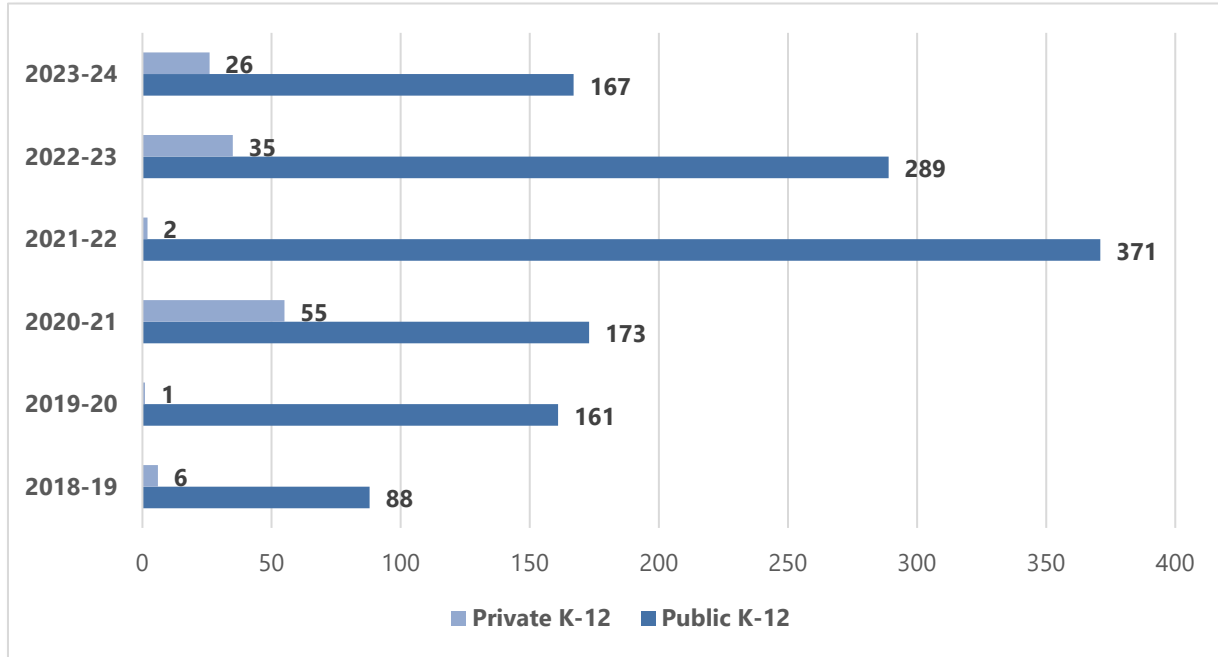
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[109] The specific facilities the RVAT has assessed is confidential. To protect schools that have not had an assessment completed, PSP policy is to provide only aggregated information.

Exhibit 22

RVAT K-12 Assessments Completed*
(FY 2018-19 to 2023-24)

Note:
*In addition to the K-12 completed assessments in this exhibit, RVAT has completed another 617 assessments on buildings for higher education (28), preschools (31), government (74), houses of worship (285), and other critical infrastructure (199).
Source: Developed LBFC Staff with data provided by the PSP.

RVAT's assessment backlog has improved, it is at a slower pace than many pending school districts would probably prefer. For example, as shown in Exhibit 23, the backlog was at its highest during FY 2020-21, at 590 assessments. Since then, the backlog has reduced, but as of FY 2023-24, 533 total assessments are still pending.

Exhibit 23

RVAT K-12 Assessments Pending[*]
(FY 2018-19 to 2023-24)
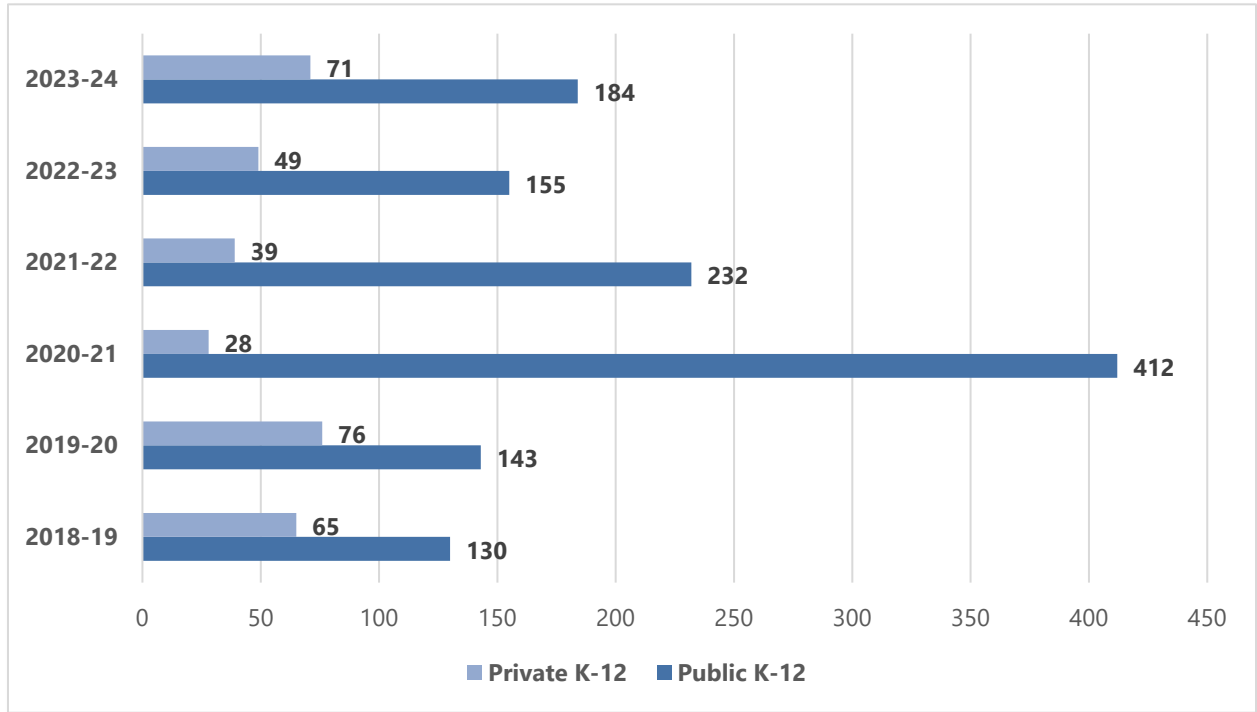
Note:
[*]In addition to the K-12 pending assessments in this exhibit, RVAT has another 1,104 assessments pending for higher education (127), preschools (34), government (95), houses of worship (292), and other critical infrastructure (556).
Source: Developed LBFC staff with information provided by the PSP.

According to a PSP representative we interviewed, the pending assessment backlog is being addressed. In immediate terms, the PSP noted the following operational improvements:

- Streamlining stakeholder application, approval, and tracking processes.
- Improving report completion processes, possibly with commercially available software.[110]
- Implementing workflow tracking and approval processes for reports.

While these procedural improvements may lead to timeline enhancements, the backlog problem will continue to manifest as assessments

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[110] The PSP informed us they are testing a software program that would allow RVAT teams to complete 80 percent of their reports on site.

should be redone every three years. We inquired how many additional troopers the PSP may need to reduce its operational backlog. The PSP declined to estimate how many additional troopers would be necessary to meet the demand for RVAT assessments.

We performed additional analysis to put a "rough estimate" on the PSP's RVAT trooper need. Using the Commissioner's 2024 Report data, we found that the 18-member RVAT team completed 350 assessments in FY 2023-24. Consequently, on average, each RVAT member completed 19 assessments per year. Applying this ratio to the overall assessment backlog (533) at the end of FY 2023-24 shows that approximately ten additional troopers would be necessary to eliminate the current backlog and keep up with any future backlog. Importantly, this calculation does not factor in additional supervisory members needed to meet the PSP's operational span of control. Exhibit 24 highlights this operational demand.

Exhibit 24

Approximate Estimate of Troopers Needed to Eliminate RVAT Backlog
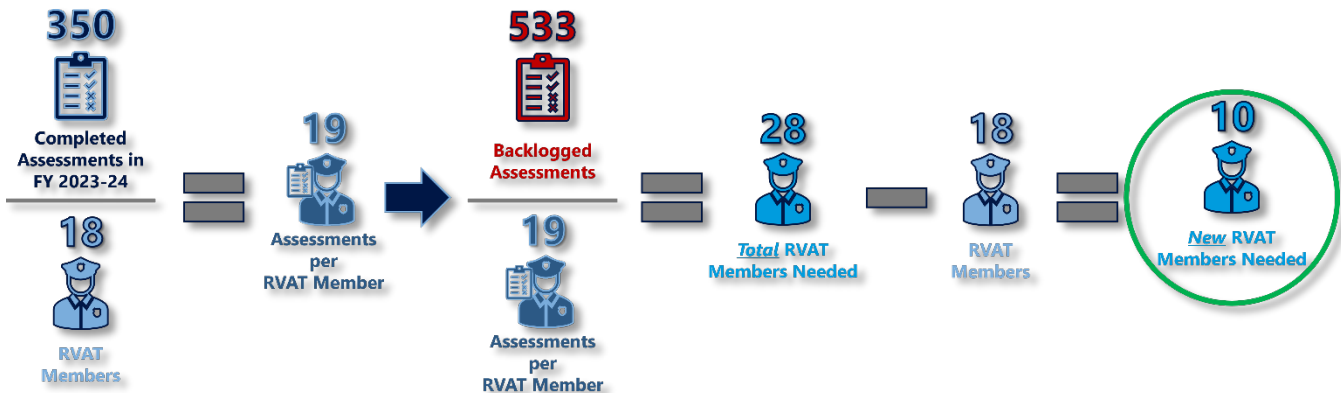
Source: Developed by LBFC staff from a review of PSP RVAT data.

Beyond the limitations of the PSP's complement cap, adding additional troopers also adds operational costs to the PSP. How much cost is difficult to pinpoint, but the analysis we conducted in 2020 provides a close estimate. In March 2020, we released a report titled *A Study of the Statutory Cap on the Pennsylvania State Police Complement*. In that report, we outlined the many additional duties added to the PSP. In addition, as part of our research in that report, we calculated a trooper's "first-year" costs. These first-year costs included training as a cadet and subsequent time spent as a trooper that year.

Exhibit 25 shows that in 2020, training and equipping a first-year trooper cost approximately $145,782. Using that same figure and applying an inflation adjustment from the United States Bureau of Labor Statistics, we found that those same costs would be approximately $178,505 as of October 2024. Consequently, as shown in Exhibit 25, a conservative estimated cost for the PSP to add ten troopers to RVAT would be roughly $1.8 million.

Exhibit 25

First-Year Costs to Train and Equip a Cadet/New Trooper[a]
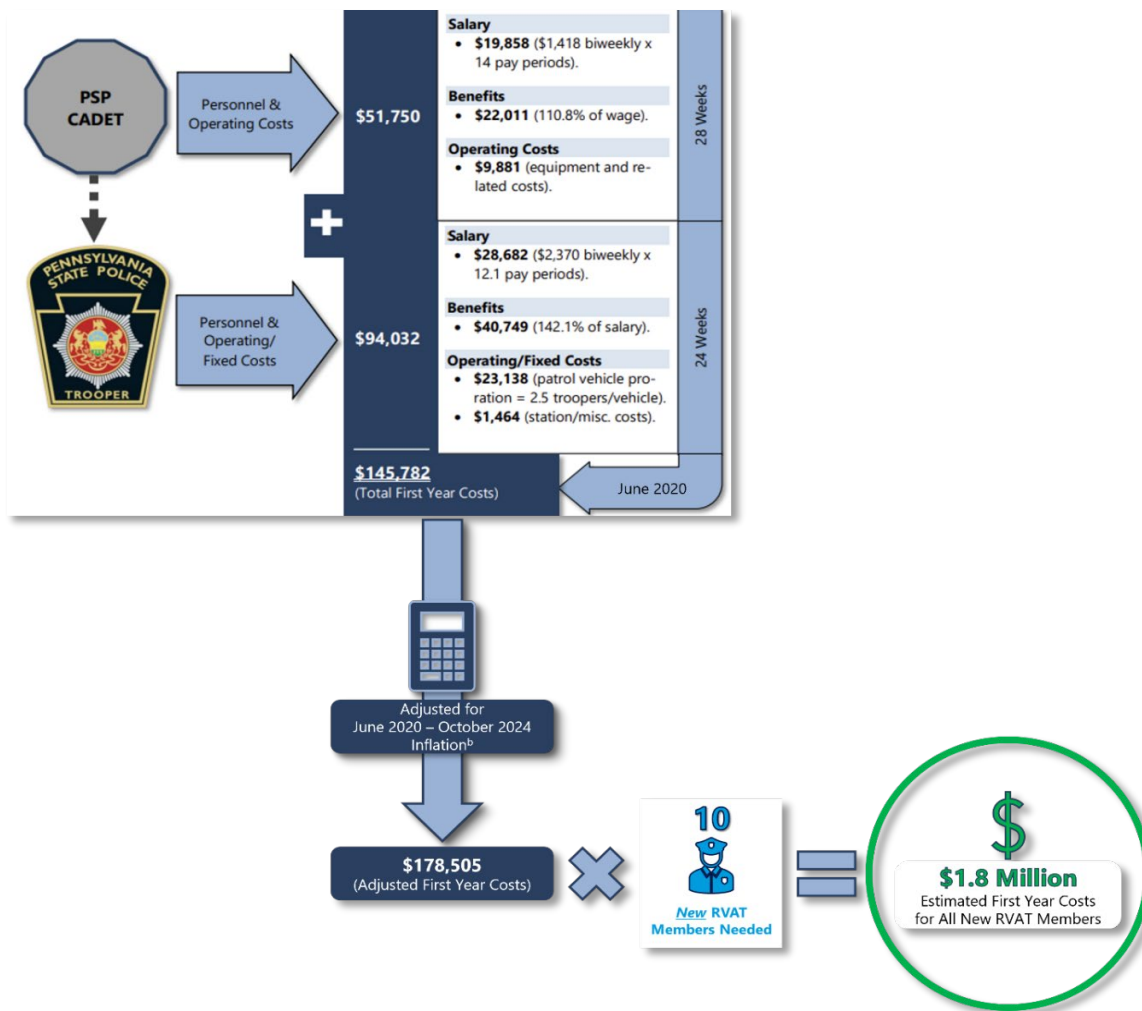
Notes:
[a]/Costs do not include indirect costs such as PSP academy trainer salaries, administrative processing, etc.
[b]/Inflation metrics are from the United States Bureau of Labor Statistics Consumer Price Index Inflation Calculator.
Source: Developed LBFC staff.

This calculation has three important caveats, which probably underestimate the actual cost. First, additional training and certifications are needed to become an RVAT member. Second, RVAT members are specialized positions that newly graduated troopers would not fill. As such, salary costs would typically be higher because those RVAT members would be more senior. Third, and as previously mentioned, adding additional troopers would likely influence the PSP's span of control, meaning that additional corporals, sergeants, etc., may be required. Our analysis does not include these considerations.

In conclusion, we recommend that the PSP increase the number of troopers assigned to RVAT or include non-PSP or civilian members to assist with the assessment process. This consideration is worthwhile, especially when, as discussed in the next issue area, there are already similarly trained, certified professionals conducting these assessments for other school entities. However, having civilian personnel conducting these duties may bring forth labor contract considerations as PSP members now hold the duties.

B. Non-PSP RVAT Assessments

Since most school entities do not meet the requirements for priority status for a PSP RVAT assessment, Act 44 also established guidelines for schools to fund their school safety and security assessments privately. This issue explores the three areas comprising the private-provider school safety and security assessments: assessment criteria, preparedness survey, and provider registry.

School Safety and Security Assessment Criteria

As referenced in Issue Area A, Act 44 added Section 1303-B to the Public School Code, which required the SSSC to establish criteria for school safety and security assessments in the commonwealth by September 2018. At the direction of the General Assembly, the SSSC's established criteria addressed specific requirements within three distinct domains:
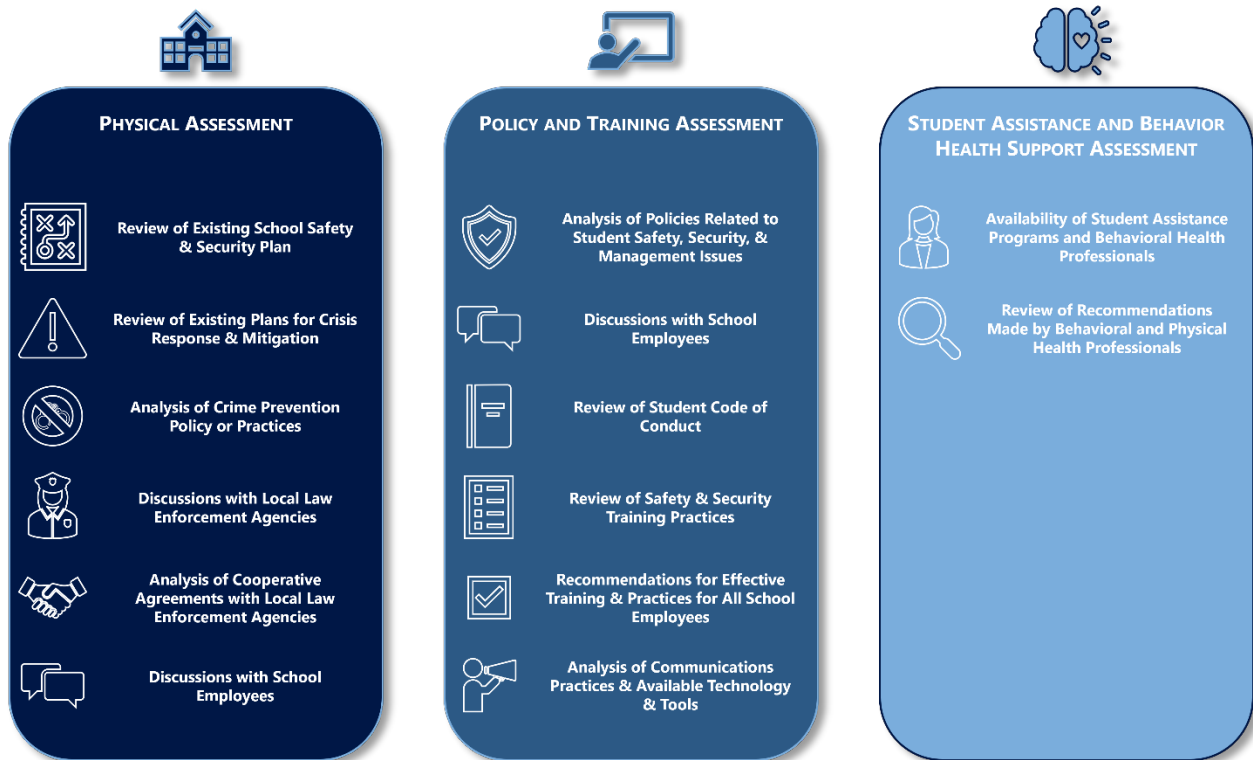
1. *Physical assessment.* An evaluation completed during a school session day that reviews aspects of a school entity's property and structural facilities, including:
   - A review of the school entity's existing school safety and security plan.
   - A review of the school entity's existing plans for crisis response and mitigation.

- An analysis of the school entity's crime prevention policy or practices, including environmental design.
- Discussions with the local law enforcement agencies primarily responsible for protecting and securing the school.
- An analysis of the school entity's cooperative agreements with the local law enforcement agencies primarily responsible for protecting and securing the school.
- Discussions with the school entity's employees.

2. ***Policy and training assessment.*** An evaluation of the administrative procedures and training practices used by a school entity, including:
   - An analysis of the school entity's policies related to student safety, security, and management issues.
   - Discussions with the school entity's employees.
   - A review of the school entity's student code of conduct.
   - A review of the school entity's safety and security training practices.
   - Recommendations for effective school safety and security training and practices for all school employees.
   - An analysis of the school entity's communications practices and available technology and tools.

3. ***Student assistance and behavioral health support assessment***. An evaluation of the school entity's climate, including:
   - The availability of student assistance programs and behavioral health professionals to assist the school entity.
   - A review of recommendations made by behavioral and physical health professionals and consideration of their recommendations.

Exhibit 26 highlights the current requirements for school safety and security assessment criteria under Section 1303-B.

Exhibit 26

Act 44 Requirements for School Safety and Security Assessments

PHYSICAL ASSESSMENT

Review of Existing School Safety & Security Plan

Review of Existing Plans for Crisis Response & Mitigation

Analysis of Crime Prevention Policy or Practices

Discussions with Local Law Enforcement Agencies

Analysis of Cooperative Agreements with Local Law Enforcement Agencies

Discussions with School Employees

POLICY AND TRAINING ASSESSMENT

Analysis of Policies Related to Student Safety, Security, & Management Issues

Discussions with School Employees

Review of Student Code of Conduct

Review of Safety & Security Training Practices

Recommendations for Effective Training & Practices for All School Employees

Analysis of Communications Practices & Available Technology & Tools

STUDENT ASSISTANCE AND BEHAVIOR HEALTH SUPPORT ASSESSMENT

Availability of Student Assistance Programs and Behavioral Health Professionals

Review of Recommendations Made by Behavioral and Physical Health Professionals

Source: Developed by LBFC staff.

The SSSC established a pair of workgroups in the late summer/early fall of 2018 to design the assessment criteria outlined in Act 44. These workgroups brought together expertise in education, school administration, architecture, public safety, physical security, mental health services, and public policy and used pre-existing, established school safety assessment materials to compile a list of best practices for the commonwealth's schools.

PCCD divided the workgroups into physical security and behavioral health domains, with the policy and training requirements overlapping. As mentioned previously, given the agency's history of evaluating the safety of public facilities, the SSSC derived many of the physical security assessment criteria from the existing requirements used by the PSP in RVAT assessments. The task was more challenging for the behavior health workgroup; however, because it needed to be coalesced from multiple sources and experts as a statewide standard.
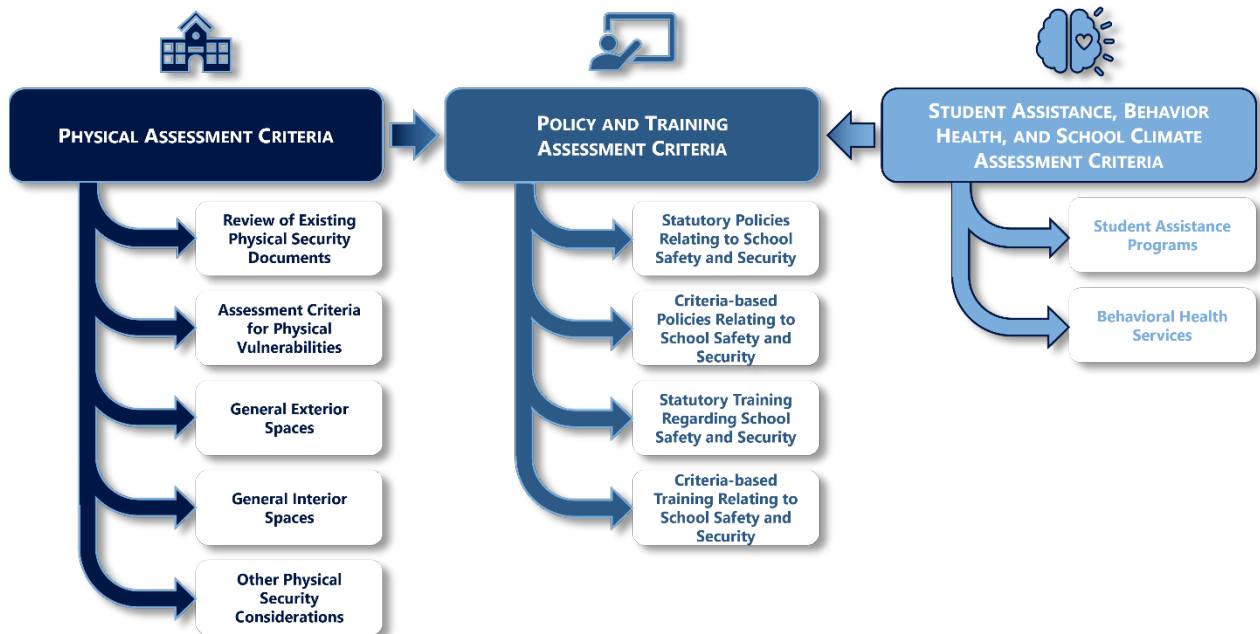
In 2018, the SSSC adopted the first iteration of the school safety and security assessment criteria. The physical security and behavior health

workgroups were later reassembled to revise the assessment criteria, better aligning the requirements with the tiered structure of the baseline criteria. The SSSC adopted the revised criteria, along with the newly established baseline criteria, on February 24, 2021.

Together, the assessment criteria review 11 areas of a school entity's physical security, behavioral health and climate, and training environment (highlighted in Exhibit 27). Additionally, Appendices B and C list the membership of the physical security and behavioral health workgroups as of August 2020.

Exhibit 27

School Safety and Security Assessment Criteria Areas
(February 2021)

PHYSICAL ASSESSMENT CRITERIA	POLICY AND TRAINING ASSESSMENT CRITERIA	STUDENT ASSISTANCE, BEHAVIOR HEALTH, AND SCHOOL CLIMATE ASSESSMENT CRITERIA
Review of Existing Physical Security Documents	Statutory Policies Relating to School Safety and Security	Student Assistance Programs
Assessment Criteria for Physical Vulnerabilities	Criteria-based Policies Relating to School Safety and Security	Behavioral Health Services
General Exterior Spaces	Statutory Training Regarding School Safety and Security	
General Interior Spaces	Criteria-based Training Relating to School Safety and Security	
Other Physical Security Considerations		

Source: Developed by LBFC staff from information obtained from PCCD.

According to PCCD, these criteria are intended to be used as a compilation of best practices for school entities when conducting their security assessments or by approved providers assessing security preparedness on behalf of a school entity. Facility structure, resources, and administration priorities help determine which areas of the assessment criteria apply to a school entity and which steps a school entity must take to implement or improve its security posture once an assessment has been completed.

As directed by Section 1303-B (b), the SSSC must review the school safety and security assessment criteria at least triennially and make updates as needed. With the first update in 2021, the Committee was due to review the criteria again by February 2024. However, PCCD expressed that the SSSC is overdue for this statutory review and has not yet aligned the assessment criteria with the revisions made to the commonwealth's baseline criteria in 2023.[111] **As a result, we recommend that the SSSC prioritize the periodic review of its school safety and security assessment criteria to bring the materials in line with the statutory requirements of the Public School Code.**

School Safety and Security Preparedness Survey

Act 44 also required the SSSC to develop a survey instrument to be used in assessing the preparedness of school safety and security. Under Section 1305-B of the Public School Code, the survey was to be developed, administered to all school entities, and reviewed by the Committee by January 31, 2019. At the direction of the General Assembly, the SSSC's review was intended to evaluate each school entity's safety preparedness, identify the school entities that had conducted their own safety and security assessments in the three years before the survey, and determine which pre-existing assessments met the SSSC's new assessment criteria. Subsequent legislation added amendments to Section 1305-B, which required the survey to be administered at least every two years and created a similar survey instrument for assessing school mental health services.[112]

Since 2018, the SSSC has administered its school safety preparedness survey twice: during the 2020-21 and 2022-23 school years. For this report, we intended to review survey data from the three years it was administered to determine which school entities had improved, maintained, or regressed in their safety preparedness since Act 44 was passed. However, confidentiality requirements within Section 1305-B prevented the SSSC from sharing raw survey results for our review.[113] Instead, the SSSC agreed to release aggregated data from the survey for use in this study, the results of which are presented in Exhibit 28.
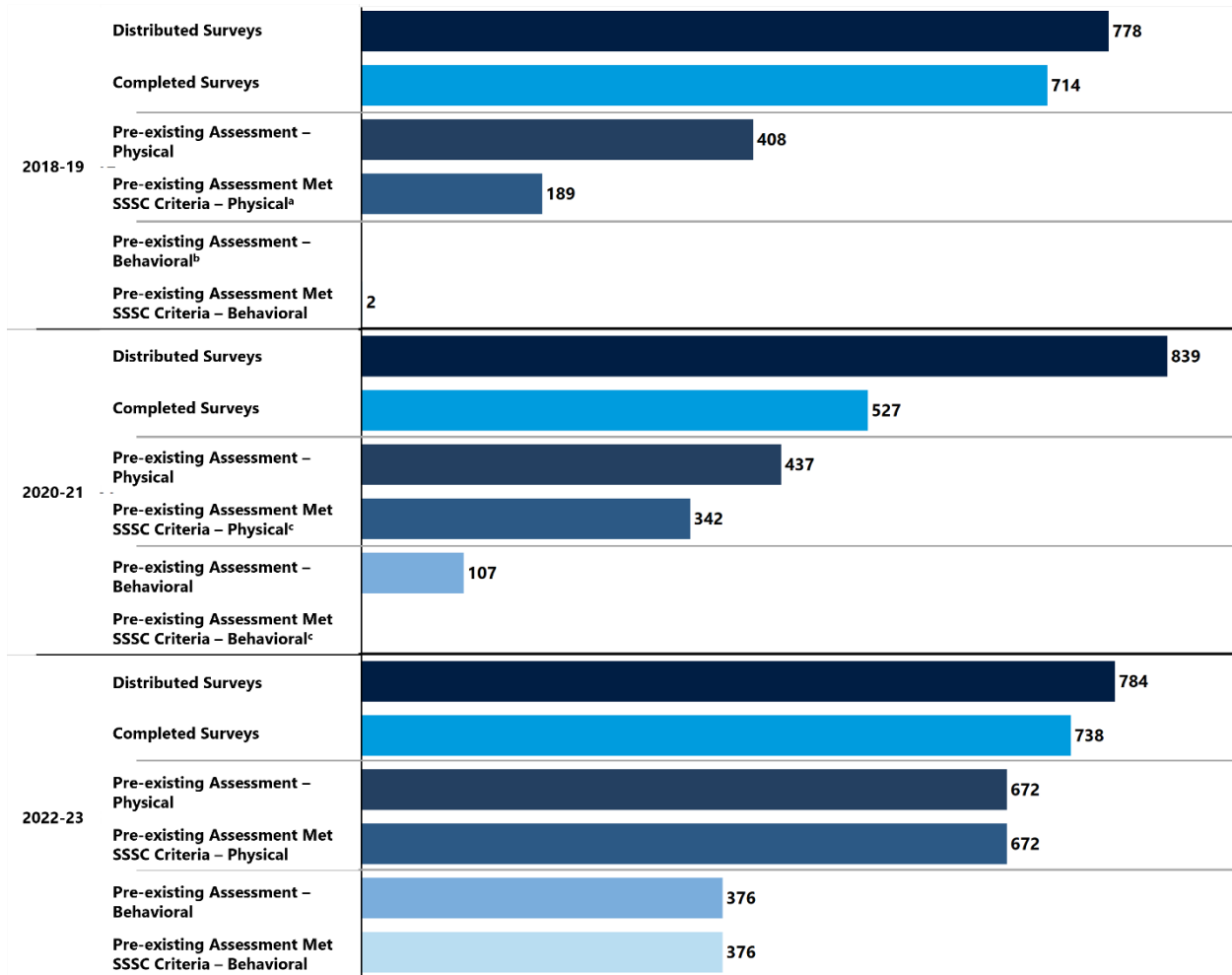
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[111] In PCCD's analysis, limited changes to the assessment criteria would be required as a result of the recent changes to the state's baseline criteria. According to the Commission, any updates would be to better reflect points of emphasis made in the revisions to the baseline criteria.

[112] Act 18 of 2019 added a requirement for the SSSC to administer its school safety preparedness survey at least biennially and revise the survey instrument as needed. Act 55 of 2022 directed the SSSC to develop a survey for school mental health services, which assesses the size and scope of each school entity's mental and behavioral health resources.

[113] Added by Act 18 of 2019, Section 1305-B (e) prohibits the SSSC from sharing any school entity-specific data collected through the survey instrument or any of the Committee's findings from its review of the survey. Act 55 of 2022 included a similar stipulation on the newly created mental health services survey.

Exhibit 28

Aggregated School Safety Preparedness Survey Results

2018-19	Distributed Surveys	778
	Completed Surveys	714
	Pre-existing Assessment – Physical	408
	Pre-existing Assessment Met SSSC Criteria – Physical[a]	189
	Pre-existing Assessment – Behavioral[b]	
	Pre-existing Assessment Met SSSC Criteria – Behavioral	2
2020-21	Distributed Surveys	839
	Completed Surveys	527
	Pre-existing Assessment – Physical	437
	Pre-existing Assessment Met SSSC Criteria – Physical[c]	342
	Pre-existing Assessment – Behavioral	107
	Pre-existing Assessment Met SSSC Criteria – Behavioral[c]	
2022-23	Distributed Surveys	784
	Completed Surveys	738
	Pre-existing Assessment – Physical	672
	Pre-existing Assessment Met SSSC Criteria – Physical	672
	Pre-existing Assessment – Behavioral	376
	Pre-existing Assessment Met SSSC Criteria – Behavioral	376

Notes:
[a]/ The 2018-19 survey was the only year school entities were required to submit copies of their pre-existing assessments for SSSC review. According to PCCD, it was determined that Act 44's directive for the SSSC to review surveys and notify school entities of its findings only applied to the 2018-19 survey. Results in subsequent surveys reflect the indication made by school entities on their survey submissions.
[b]/ The submission of behavioral health results was not required during the first administration of the survey, as the SSSC had only adopted the student assistance and behavioral health support assessment criteria in September 2018. PCCD notes that school entities were not expected to have completed a behavioral health assessment during survey administration.
[c]/ In 2020-21, the SSSC did not distinguish between physical security and behavioral health when asking school entities whether or not pre-existing assessments met the SSSC's criteria for preparedness.
Source: Developed by LBFC staff from information obtained from the SSSC.

The SSSC experienced a response rate of over 90 percent in two of the three years it administered the survey, with 92 percent of school entities

completing the survey in 2018-19 (714 completed surveys out of 778 distributed) and 94 percent (738 of 784) doing so in 2022-23. While the response rate was significantly lower at 63 percent (527 of 839) in 2020-21, there are several logical explanations for this occurrence.

First, PCCD expressed that the COVID-19 pandemic caused a large disruption for schools from their normal practices, which continued through 2020-21. Second, the survey was distributed as a standalone questionnaire without any alignment with upcoming funding cycles. While completion of the survey is not required to receive funding from the School Safety and Security Grant Program, PCCD noted that many school entities believed the two were linked in 2018-19, as the survey was released at the same time that the grant process was opened. PCCD included the survey as part of the grant application in 2022-23, which explains why the response rate was the highest in that year.

The number of school entities that reported having a pre-existing school safety assessment completed in the previous three years increased by nearly two-thirds since the passage of Act 44, from 408 schools in 2018-19 (57 percent of completed surveys) to 672 in 2022-23 (91 percent). The proportion of school entities reporting that their pre-existing physical security assessment met the SSSC's assessment criteria also increased significantly, from 46 percent in 2018-19 (189 of 408 completed surveys) to 100 percent in 2022-23.

However, this noticeable trend comes with the caveat that the survey conducted in 2018-19 was the only year in which school entities were required to submit copies of their pre-existing physical security assessment for review. According to PCCD, Act 44's directive for the SSSC to review surveys and notify school entities of its findings only applied to the 2018-19 survey. Results in the 2020-21 and 2022-23 surveys largely reflect the indication made by school entities on their survey submissions. **Moving forward, we recommend that the General Assembly consider amending Section 1305-B of the Public School Code to require school entities to submit copies of their pre-existing assessments with any future iterations of the preparedness survey.** This change will add a layer of validity to the survey, which has become a useful tool since 2018 in benchmarking the progress of school entities toward the goal of increased safety.

Added as an independent question for the administration of the 2022-23 survey, 376 school entities out of 738 completed surveys (51 percent) reported having a pre-existing behavioral assessment. All 376 school entities reported that their pre-existing assessment met the criteria set by the SSSC for behavioral health assessments.[114]

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[114] In 2018-19, two school entities reported having a pre-existing assessment that met the SSSC's criteria.

School Safety and Security Assessment Provider Registry

Finally, Section 1304-B of the Public School Code tasks the SSSC to "establish criteria for registration of a person with knowledge and experience in matters of school safety and security that qualifies the person to conduct school safety and security assessments based on the criteria established by the Committee." The SSSC coupled this directive with creating criteria for school safety and security assessments since, as noted, the Committee intended to allow assessments to be self-administered by individual school entities if needed.

Following the timeline set by Act 44, the SSSC's physical security and behavior health workgroups identified the necessary background for an individual to be designated as a school safety and security assessment provider by October 2018. The criteria, updated in 2022, include requirements for all school safety and security assessment providers, as well as specific standards for providers of physical assessments and student assistance, behavioral health, and school climate assessments. Exhibit 29 summarizes the requirements for school safety and security assessment providers.

Exhibit 29

School Safety and Security Assessment Provider Criteria*

ALL SCHOOL SAFETY AND SECURITY ASSESSMENT PROVIDERS

1. Obtain Act 126 (Mandated Reporter Training), Act 34 (PA Criminal History), Act 151 (PA Child Abuse), and Act 114 (FBI Fingerprinting) certifications/clearances
2. Affirm to no arrests or convictions under Section 111 of the Public School Code (Criminal History of Employees), 23 Pa.C.S. §6344 (Employee Contact with Children, or 42 Pa.C.S. Chapter 97 (Registration of Sex Offenders)

PHYSICAL ASSESSMENT PROVIDERS

Meet *at least one* of the following:

1. Certified by an accredited organization that provides physical risk and vulnerability assessments
2. Currently or has served at least one year as a Physical Security Assessor in PSP RVAT
3. Served as a Physical Security Assessor in a federal law enforcement agency, other state police department, or municipal police department equivalent to PSP RVAT for at least two years
4. Served as the School Resource Officer or School Police Officer at any K-12 public school in Pennsylvania or at any private school in the state for at least five years with a National Association of School Resource Officers certificate or equivalent training
5. Served as a Physical Security Assessor in any branch of the U.S. armed forces or Department of Defense for at least five years and holds a physical security certificate validated by the National Commission for Certifying Agencies
6. Completed risk and vulnerability assessments and issued reports for at least 10 public or private school buildings in the last five years
7. Served as a school district employee with at least five years of experience in conducting risk and vulnerability assessments
8. Currently or has served with PDE with at least five years of experience relating to school safety planning or assessment tools
9. Currently or has served with a state agency with at least five years of experience relating to safety and security assessments
10. Registered architect currently serving with an architecture firm specializing in educational facilities with at least five years of experience relating to school design/building security and is Crime Prevention Through Environmental Design certified or has similar training/certification

STUDENT ASSISTANCE, BEHAVIOR HEALTH, AND SCHOOL CLIMATE ASSESSMENT PROVIDERS

Meet *at least one* of the following:

1. PDE-recognized certification in behavioral health and the ability to conduct behavior health assessments that incorporate all the pertinent components identified in the Student Assistance and Behavioral Health Support Assessment Criteria and Policy and Training Assessment Criteria
2. Resume and certifications indicating knowledge base and competency to conduct assessments in the following areas:
    - Multi-Tiered Systems of Support/Positive Behavioral Interventions and Supports
    - Student Assistance Programs
    - School climate considerations
    - Statutory and criteria-based policies/procedures relating to behavioral health school safety and security
    - Statutory and criteria-based training relating to behavioral health school safety and security

Notes:
*/Simplified exhibit for illustrative purposes.
Source: Developed by LBFC staff from information obtained from PCCD.

The Committee also authorized PCCD to create the School Safety and Security Provider Registry, an online database storing information on all approved school safety and security assessment providers.[115]

Free and accessible to the public, the registry allows school entities to search for eligible assessment providers who work in their county. The registry includes the relevant background, credentials, and contact information for each provider, giving school entities full autonomy over choosing who conducts their assessments. Since 2018, the SSSC has delegated its authority to approve applicants to PCCD. As a result, providers may apply through an online portal and may contact PCCD via email with the information needed to satisfy the criteria outlined above for approval and addition to the registry.

While PCCD stores and maintains the information on the registry, it is not required to collect any additional information from providers, including the number of assessments performed by each provider. Therefore, we worked with PCCD to survey providers to learn more about the assessment process from their first-hand perspective.

Given the timeline of this report, our survey was kept brief and included roughly one-fifth (46/221) of the approved provider list maintained by PCCD. Within this group, 33 respondents were exclusively physical assessment providers, eight were student assistance, behavioral health, and school climate assessment providers, and five offered both services.

Exhibit 30 shows the number of providers in our sample by county of operation. Please note that many providers service multiple counties.

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[115] The registry can be found at schoolsafetyregistry.pccd.pa.gov, accessed January 6, 2025.

Exhibit 30

School Safety and Security Assessment Provider Survey
Providers by County of Operation*
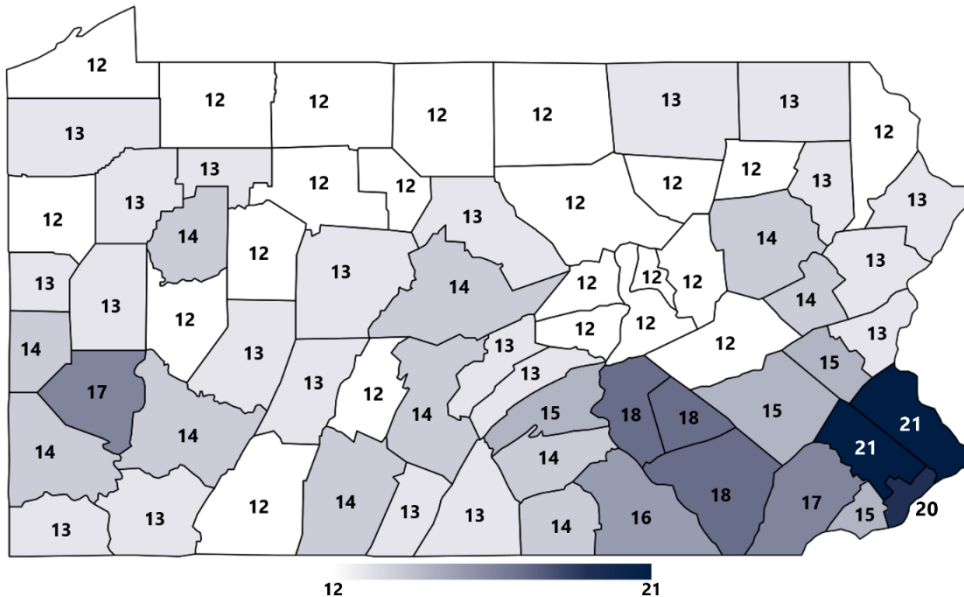
Notes:
*/Providers can service multiple counties.
Source: Developed by LBFC staff from information obtained from PCCD.

Our sample of providers reported conducting 742 school safety and security assessments since the passage of Act 44 of 2018. However, nearly half of the surveyed providers (19) reported conducting less than five assessments in the six years since Act 44 was passed, with five physical assessment providers indicating that they had not conducted any assessments.

While conducting risk and vulnerability assessments is one potential prerequisite for being an SSSC/PCCD-approved school safety and security assessment provider, it is not mandatory. Further, an individual cannot conduct a valid school safety and security assessment using the criteria created by the SSSC until they have been approved as an eligible provider. In at least one scenario, we had a provider report being "pre-approved" by the SSSC to assess a specific school entity, only to see the work not come to fruition.

When discussing this matter with PCCD, Commission staff informed us that there is currently no process to periodically review the registry to check the status of the providers listed. The lack of review is largely due to the workload of PCCD staff. PCCD stated that performing "spot checks" on registry providers is a desired activity, but the lack of staffing to conduct the checks is an issue.

While understandable, school entities are ultimately disadvantaged without adequate review of the registry, as they cannot know if a provider is still actively performing assessments based on the available information. Indeed, throughout our survey, multiple individuals informed us that they no longer conduct assessments, primarily due to a change in occupational status (retired, change in place of work, etc.). As the time since the creation of the provider registry's initial iteration has grown, this issue will likely only increase. Further, even among providers who remain "active," school entities cannot distinguish between professionals with extensive experience conducting assessments with the SSSC criteria and those without.

As school safety and security become more complex with the advancement of time and technology, it is vital that the initiatives created under Act 44 also evolve. A robust pool of school safety and security assessment providers is essential to ensuring the welfare of the commonwealth's schools.

Moving forward, we believe that several changes can be implemented to enhance the state of the School Safety and Security Provider Registry.

- **First, much like the General Assembly directs the SSSC to review the criteria established for assessment providers at least every three years, we recommend the legislature consider amending Section 1304-B of the Public School Code to enact a similar provision for the School Safety and Security Provider Registry.[116]**

- **Second, we recommend the SSSC require providers to report the number of assessments completed by type (physical assessments, student assistance, behavioral health, and school climate assessments) annually.**

- **Finally, we recommend that the SSSC and PCCD consider options for integrating information about the number of assessments completed by providers into the registry so that school entities can better identify experienced professionals.**

However, these recommendations are not meant to negate the positive impact that the school safety and security assessments or provider registry have had on the commonwealth. While several of our survey respondents expressed concerns with the content, clarity, or format of materials included in the assessment, as shown in Exhibit 31 below, 40 of the 46 responding providers (87 percent) rated the school safety and security assessment criteria as either "effective" or "very effective" in identifying

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[116] The requirement to review the criteria for providers falls under Section 1304-B (b) of the Public School Code. PCCD informed us that the SSSC has updated the criteria once since the passage of Act 44, in order to better align with the assessment criteria also established by the Committee.
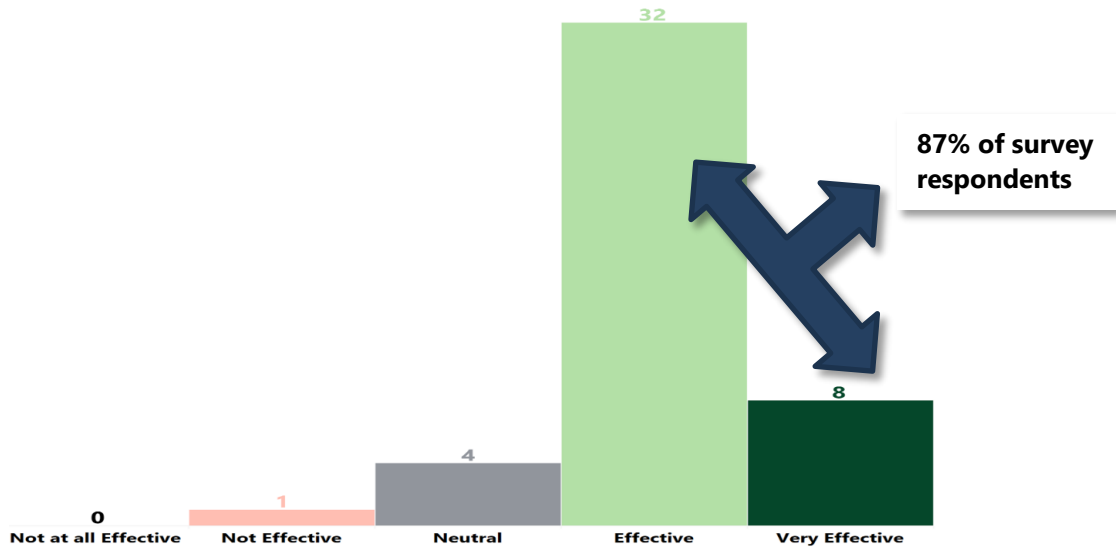
and addressing physical or behavioral health safety and security concerns within schools.

Exhibit 31

**The Vast Majority of Providers Rate Pennsylvania's
School Safety and Security Assessment Criteria as
"Effective" or "Very Effective"**

Source: Developed by LBFC staff from surveying a sample of school safety and security assessment providers.

Finally, it should be noted that the efforts of the SSSC and PCCD have also been positively received. In the words of one provider:

> *Since 2018, PCCD has really become a critical and welcomed partner in school safety and security. Their attention to school security needs and asking the educational provider community their thoughts is crucial to [our] district's relationship with PCCD.*

By addressing the concerns outlined in this section, the SSSC and PCCD can continue to build upon the significant foundational work accomplished in the six years since the passage of Act 44.

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SECTION V
SCHOOL CLIMATE MONITORING AND REPORTING

Overview

While the addition of the statewide grant program, baseline criteria, and assessment criteria have all been valuable additions to the school safety landscape, most of the responsibility for school security still falls to those on the "front lines" in and around schools every day. This section focuses on the multiple programs, policies, and tools Act 44 instituted to enhance the daily monitoring and reporting of school climate issues.

Act 44 created the Safe2Say Something (S2SS) program under the Pennsylvania Office of Attorney General (OAG) as an anonymous reporting tip line to report suspicious activities or concerning behaviors to the proper authorities. Tips can be submitted via several communication methods (phone, text, web, or app), all of which are sent to the S2SS crisis center to be processed in real-time. According to the program's annual reports, nearly 148,000 tips have been received by S2SS since 2018. However, due to confidentiality protections outlined in the Public School Code, we were prohibited from reviewing the program's records beyond its public annual reporting. In turn, this prevented us from reviewing tip dispositions, specifically the timeliness and specificity by which school entities resolved referred tips. We believe this is an area that requires further research and review. We recommend statutory changes, advanced training, and periodic performance reviews to be conducted by us on a five-year basis.

According to the National Center for Education Statistics, in the 2019-20 school year, approximately 65 percent of all public schools had at least one security personnel within the school at least once a week. Act 44 significantly changed the security-related staffing practices used by school entities. The legislation formalized training and educational requirements for school police officers (SPOs), school resource officers (SROs), and school security guards (SSGs), setting the groundwork for future codification of standards surrounding the umbrella term "school security personnel."

Act 55 of 2024 recently required that all school districts have at least one full-time, fully trained school security person beginning with the 2024-25 school year. Hearing from school districts about this mandate's potential challenges, we reviewed open-source data from the Pennsylvania Department of Education (PDE). We found that 440 school entities (and 226

school districts) reported employing no security personnel as of the 2023-24 school year, potentially creating an influx of exception waivers to be filed with the SSSC.

Act 44 also required that each school entity designate an administrator as its "school safety and security coordinator," who is responsible for all of the district's security personnel and ensuring that the district's policies and procedures comply with state law. In this role, the coordinator organizes student and staff safety training, reports on security procedures and personnel, and is the school's liaison with law enforcement and other public safety officials. The school safety and security coordinator is a critical position within school safety. However, we fielded concerns from multiple stakeholders over the lack of certification requirements currently in place for the position.

We conclude this section by reviewing annual school district "incident data" maintained by PDE. This self-reported safety and security measure can provide insight into Pennsylvania's current school climate. As expected, we found that the statewide average of incidents per 100 school enrollments experienced a dramatic decline during the COVID-19 pandemic. However, whereas the rate of incidents was declining pre-COVID, the number of incidents per 100 enrollments is significantly higher in the post-pandemic school environment. Incidents per 100 enrollments peaked at 14.9 in 2022-23, a 57 percent increase from 2018-19.   We found common incident types reported by school entities included code of conduct violations, fighting, possession/use of a controlled substance, and minor altercations.

Issue Areas

A. Safe2Say Something Program

Act 44 of 2018 established the Safe2Say Something Program (S2SS) within the Pennsylvania Office of Attorney General (OAG). S2SS is a youth violence prevention program that informs students and adults to recognize signs/signals of individuals who may be harmful to themselves or others. Individuals can anonymously report confidential tips[117] in four ways:

1. phone to the 24/7 crisis hotline,
2. the S2SS website,
3. text message, or
4. mobile application (app).

Act 44 requires every commonwealth school entity to participate in S2SS. Students and staff can receive training on S2SS protocols, including identifying concerning behavior(s). Per Act 44, all records of the S2SS program are confidential and not subject to the Right-to-Know Law (Act 3 of 2008). Further, under Act 44, an individual knowingly or intentionally making a false report to S2SS is committing a misdemeanor of the third degree.

When reports are received, a crisis center analyst triages the tips by conducting a two-way anonymous conversation with the tipster to gather any missing information so that enough information is provided to schools and/or law enforcement.

As part of our study, we visited the S2SS headquarters in Harrisburg. While there, we met with S2SS staff and observed the process as tips entered the center in real-time. We also reviewed selected prior tips to see the process from beginning to referral to the respective school district. All the information we observed was confidential; thus, we cannot provide specific details about the visit and the reporting process. In summary, we were impressed with the staff's professionalism and the diligence each tip received as it was reported.

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[117] The term "report" and "tip" are used interchangeably within the Safe2Say Something program, but the formal term is "report." However, "report" should not be confused with the annual reports that the OAG must prepare and release under Act 44 of 2018.

Tip Disposition/Resolution

A concern we noted is the tip's disposition after being referred to the appropriate school entity. More specifically, we found that once a tip is referred from the S2SS program there is no further requirement to ensure that the tip is handled in a timely manner. If we had been given access to S2SS data, we would have tested this potential condition further and reviewed the internal controls over tip disposition. The program director noted that S2SS staff will periodically review the data (typically in advance of preparing the OAG's annual report) and will remind school entities to properly resolve tips. Still, entities have no statutory requirement to act and ensure tips are resolved timely. We believe this is an area for improvement in Pennsylvania's S2SS program, and based on our research, we found potential models in five other states: Colorado, Michigan, Ohio, Wisconsin, and Wyoming. Key aspects of these state tiplines and the respective reporting requirements are outlined below.

Colorado. Colorado operates an anonymous reporting school safety hotline known as "Safe2Tell." While Safe2Tell (S2T) began as a non-profit organization working in close collaboration with the Colorado State Government, the program was officially established as a state program in 2007 pursuant to the Colorado Safe2Tell Act.[118] The S2T Act requires the program to forward reported tip information regarding unsafe, potentially harmful, dangerous, violent, or criminal activities in schools to local law enforcement, public safety agencies, or school officials. Like Pennsylvania's program, S2T must implement methods and procedures to ensure the confidentiality of reporting parties, including from S2T employees, with rare exceptions.[119]

The program falls within the auspices of the Department of Law under the Colorado Attorney General's Office. It collaborates with the Colorado Information Analysis Center (CIAC) in the Colorado Department of Public Safety to answer and distribute reports. Analysts at the CIAC then communicate with reporting parties in a two-way dialog to extract as much information as possible. S2T analysts must review every report and promptly forward it to local multidisciplinary teams comprised of local school and law enforcement personnel.[120]

Most pertinently, the S2T Act requires the program to "[a]nalyze and follow up with law enforcement and schools to determine the outcome of a report made to the program, including actions taken on the report."[121] To comply with this requirement, S2T gives multidisciplinary teams who

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[118] C.R.S. § 24-31-601 *et seq*.

[119] C.R.S. § 24-31-606(2)(b).

[120] Safe2Tell Colorado. *What We Do.* https://safe2tell.org/what-we-do/l, Accessed February 3, 2025.

[121] C.R.S. § 24-31-606(2)(n).

have received a report, 30 days to provide a response or outcome infor-
mation and mark a report as closed. Once the report has been ad-
dressed, all intervening parties must complete disposition documentation
that memorializes the action taken and any relevant outcomes. Addition-
ally, as a compliance aspect, performance audits of the program, includ-
ing a review of S2T's report disposition records, are completed.[122]
An additional internal control within the S2T program is statutorily re-
quired annual training, which expressly includes outcome reporting train-
ing. The training is designed to ensure that school officials are engaged
in proper and consistent outcomes reporting[123]

Michigan. Michigan enacted the Michigan Student Safety Act
(MSSA)[124] in 2013, which requires the Michigan State Police, the Michi-
gan Department of Health and Human Services, and the Michigan De-
partment of Education to establish a hotline for filing confidential reports
of potential harm or criminal activities directed at school students, school
employees, and schools. The program must also protect the confidenti-
ality of a reporter's identity, operate 24 hours a day, 365 days a year, and
promptly provide tip information to the appropriate school officials, law
enforcement, or other agencies.[125]

The Michigan Department of State Police operates the program and con-
ducts continuous oversight. Some of this oversight includes reviewing all
information submitted through the hotline and directing those reports
and information to the appropriate local law enforcement officials and
school officials. The MSSA also requires the program to provide an au-
diting mechanism for evaluating report responses for effectiveness.[126]
Further, the department must prepare an annual report on the program,
which must include an analysis of the program's overall effectiveness in
addressing potential self-harm and potential harm or criminal acts di-
rected at schools, school employees, and students.[127]

At a minimum, the school's governing body must provide the Depart-
ment of State Police with current emergency contact information for at
least one school official to receive information regarding reports made
through the hotline on a biannual basis. This school official will essen-
tially serve as the point person for school communications with local law
enforcement officials and the department. Like the S2SS program, the
MSSA requires that all reporting or information submitted through the
hotline remain confidential.[128]

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[122] Colorado Office of the State Audit. *School Safety Performance Audit.* September 2019. https://leg.colo-
rado.gov/sites/default/files/documents/audits/1819p_school_safety_0.pdf, Accessed February 3, 2025.
[123] C.R.S. § 24-31-606(4).
[124] Michigan Public Act 183 of 2013, known as the Michigan Student Safety Act (MSSA), §§ 752.911-752.918.
[125] MSSA § 752.913, Sec. 3(1)-(2).
[126] MSSA § 752.913, Sec. 3(4).
[127] MSSA § 752.913, Sec. 3(8).
[128] MSSA § 752.918, Sec. 8(h).

Ohio. The Ohio School Safety Center was created in 2019 by Executive Order 2019-21D. The center assists local schools and first responders with preventing, preparing for, and responding to threats and acts of violence. It operates within the Ohio Department of Public Safety and collaborates with the Ohio Department of Education and Workforce and the Ohio Department of Mental Health and Addiction Services. In addition, the center operates the Safer Ohio School Tip Line; an anonymous reporting system that accepts tips through call, text, webform, and mobile app.[129] Ohio law requires all local, city, exempted villages, and joint vocational school districts to register with Safer Ohio. The program must operate on a 24-hour, seven-day-a-week. The program must also ensure that all reported information through the tip line is forwarded to and coordinated with the appropriate school threat assessment teams, law enforcement, and public safety agencies under the school's emergency management plan.[130]

Ohio does require some anonymous tip disposition reporting from the school districts. For example, each school district is required to submit data to the Ohio Department of Education on the number and type of disciplinary actions taken as a result of the anonymous reports. Other required data reporting includes the number and type of mental wellness referrals resulting from the reports, the race and gender of the students subject to disciplinary actions and mental wellness referrals, and any other information deemed necessary by the Department of Education and the Department of Public Safety.[131]

Wisconsin. The Wisconsin Office of School Safety (OSS) administers a free statewide threat reporting tipline that is available to all Wisconsin schools. The tipline is called Speak Up, Speak Out Wisconsin (SUSO) and was officially launched in 2020. SUSO uses a behavioral threat assessment and management process designed to identify, assess, and manage potentially dangerous or violent situations for schools and students.[132] Resource Center Analysts (RCAs) at the tipline "...provide students with immediate, accessible confidential adult support 24 hours a day, seven days a week."[133] RCAs receive the tip, validate the tipster, and attempt to speak with the tipster to obtain more information. The tip is then sent to school staff and law enforcement if appropriate. These officials will then respond to, investigate, and resolve the tip. After this process, the OSS requires a disposition report to be completed. The disposition report

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[129] Ohio School Safety Center. *About Us.* https://ohioschoolsafetycenter.ohio.gov/about-us, Accessed February 4, 2025.
[130] O.R.C. § 3313.6610(A)(1)-(2).
[131] O.R.C. § 3313.6610(B)(1)-(4).
[132] Wis. Stat. § 118.07; Wisconsin Department of Justice, Office of School Safety. *Speak Up Speak Out Wisconsin 2023-2024 Annual Report.* P. 13.
[133] Wisconsin Department of Justice, Office of School Safety. *Speak Up Speak Out Wisconsin 2022-2023 Annual Report.* P. 6.

provides a full, detailed description of the outcome of the tip. The program evaluates the variation of the tip outcomes through a collection of the disposition reports and includes them in its annual report.[134]

Wyoming. Wyoming has its own version of Safe2Tell, much like Colorado (same name). Wyoming's Safe2Tell (WS2T) program was established by Wyoming Senate File 97 (SF97) in 2016. SF97 required the Wyoming Attorney General to "[e]stablish a call center to accept information related to school and student safety issues and to assist in the delivery of that information as necessary to allow for the coordination of local law enforcement, emergency response personnel and school district officials."[135] The law requires that, to the extent possible, the identities of parties reporting information through the call center remain unknown to all people and entities, and any records or information related to the call center's operation are not deemed a public record.[136] While the program has only minimal statutory requirements, the Attorney General is authorized to enact rules for its administration.[137] The WS2T program requires that each WS2T tip received must have a disposition report filed in the reporting system. Moreover, every WS2T tip must be followed up on, and detailed information must be noted for the disposition report itself. Disposition reports are inserted directly in the tip record on the "Disposition" tab. Tips are officially closed when coded as such in the system and a disposition report is saved in the tip file. If more information becomes available after the disposition report is filed, the disposition report can be updated by WS2T administrative staff. Multiple disposition reports may be submitted on each tip.[138]

Annual Reporting Analysis

As mentioned above, by August 1, OAG must submit an annual report to the House and Senate Appropriations and Education Committees. Per Act 44, the report must contain the following:

- The number of reports received during the previous school year.
- The total number of reports received since January 2019, when the S2SS program began.
- A breakdown of the reports by type, submission method, and Intermediate unit.[139]

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[134] *Ibid*
[135] Wyo. Stat. § 9-1-603(a)(ix).
[136] Wyo. Stat. § 9-1-603(e).
[137] Wyo. Stat. § 9-1-603(a)(ix).
[138] Safe2Tell Wyoming. *How to Handle a Safe2Tell Wyoming Report*. https://www.safe2tellwy.org/howtohandleareport, Accessed February 4, 2025.
[139] Act 18 of 2019 amended the reporting requirement from reporting school entity information to aggregate data by Intermediate Unit (IU).

- The total cost of operating the S2SS program includes staffing, administration, and support.
- The total number of false reports received.
- Any other information the OAG finds pertinent should be shared with the General Assembly.

We received and reviewed the annual reports from 2018-19 through 2023-24. The following points outline the significant areas from the annual reports.

- **Number of reports (tips) received since the S2SS program began in January 2019.** Exhibit 32 shows the annual reports received each year (excluding false reports and test tips). From the program's inception in 2018-19 through 2023-24, S2SS has received approximately 148,000 reports. Overall, the program continues to grow, reaching a peak of 32,873 reports in 2023-24, representing a nearly 40 percent increase from 2018-19. As expected, tips took a precipitous decline during the pandemic, with approximately a third of the tips (10,495) received from last year's peak.

Exhibit 32

Annual Number of Reports Received
(2018-19 to 2023-24)
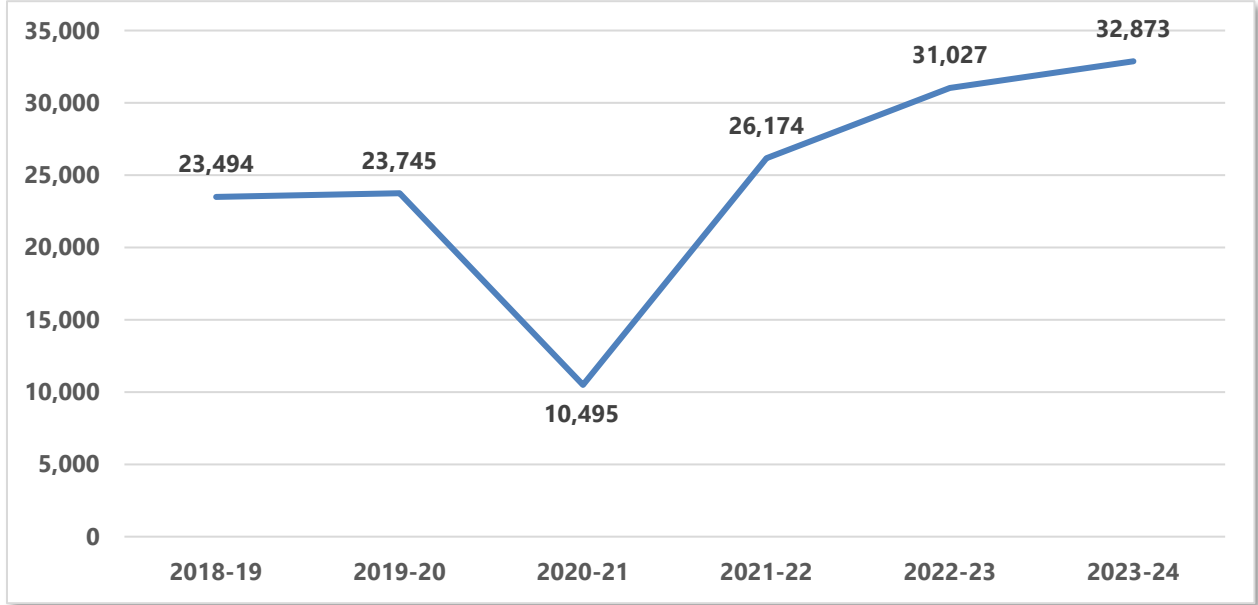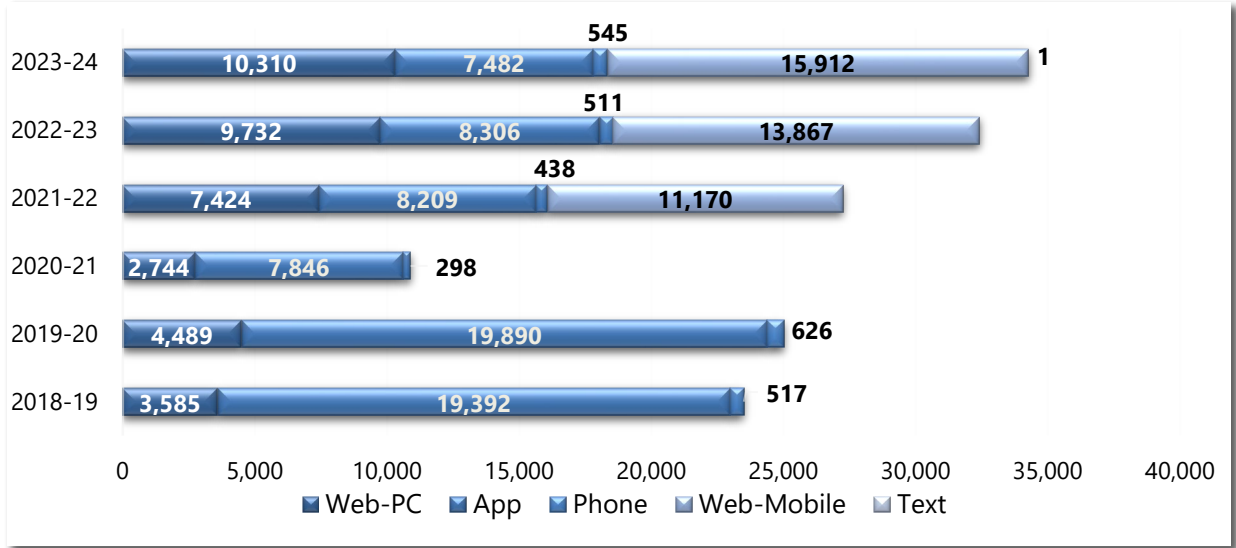

Source: Developed by LBFC staff from information published in the Safe2Say Something Annual Reports.

- **Breakdown of reports by type.** When an individual makes an S2SS report, there are 49 different categories from which to classify the report. However, the S2SS investigative analysts have additional categories they can designate during the triage phase of the reporting process. The annual reports highlight the top ten report types for each school year. Exhibit 33 illustrates the study's top six report types over the six-year review period. The number one category reported for all six years was bullying/cyberbullying, which saw an 80 percent increase in reporting between 2018-29 19 and 2023-24.

Exhibit 33

Bullying/Cyber Bullying Continues to be the Top Reported "Tip" Category
(2018-19 to 2023-24)
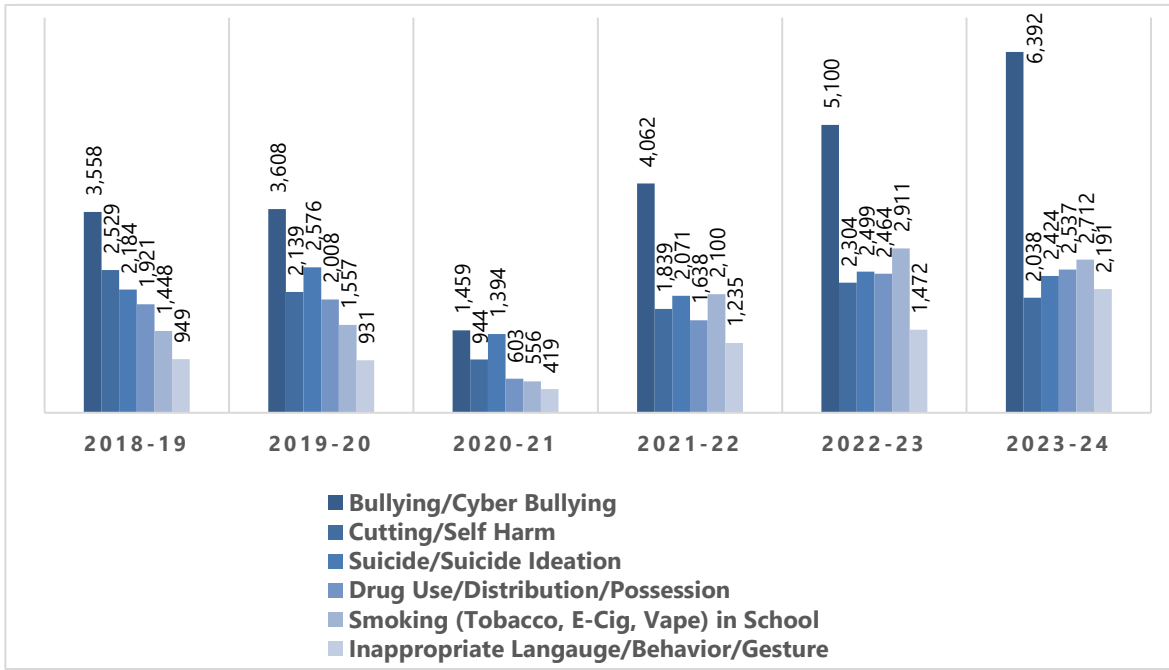
Source: Developed by LBFC staff from information published in the Safe2Say Something Annual Reports.

- **Reporting method breakdown.** Initially, reports were obtained through the Safe2Say website, the mobile app, or by calling the 24/7 hotline (1-844-SAF2SAY) and speaking directly with an investigative analyst. In 2021-22, S2SS expanded reporting to include mobile web browsers. In 2023-24, S2SS expanded the reporting method to include text messaging (note: just one text message tip was reported as received in 2023-24; thus, this capacity is still relatively new). As shown in Exhibit 34, the primary reporting method is through the S2SS website, whether it be accessing the website via computer or mobile phone. In 2023-24, S2SS received 34,250 reports through the various reporting methods, of which 77 percent were through the S2SS website.[140]

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[140] This number includes false reports and test tips.

Exhibit 34

Reporting Methods
(2018-19 to 2023-24*)

Note:
*/In 2023-24, texting Safe2Say tips became an option; however, only one tip was recorded that year.
Source: Developed by LBFC staff from information published in the Safe2Say Something Annual Reports.

- **Breakdown of the reports by Intermediate Unit (IU).** In 1970 Pennsylvania added intermediate units, with every school district falling within one of the 29 intermediate unit areas. IUs assist school districts with various services, such as curriculum development, instructional improvement, educational planning services, instructional materials, professional development, student personnel services, and management services. IUs may act as state and federal agency liaisons. Appendix D lists the 29 intermediate units and the respective counties and school districts included. Under the annual reporting requirements outlined in Act 44 (section 1307-D), the OAG was initially required to publish information by the school entity. Act 18 of 2019 subsequently amended this requirement to include reporting aggregate data only by IU. Exhibit 35 illustrates the total reports per IU. As shown, 2/3 (12,482)[141] had the most reports over the six-year study period. The lowest number of reports was IU 11 (1,503).

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[141] According to the annual report, the report numbers have been combined to streamline and simplify the data.

Exhibit 35

Total Reports by Intermediate Unit
(2018-19 to 2023-24)

IU	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	Total
1	500	717	223	619	800	917	3,776
2 and 3	1,940	2,013	922	2,638	2,483	2,486	12,482
4	1,306	1,204	620	1,094	1,110	1,052	6,386
5	523	548	219	474	939	1,037	3,740
6	249	178	92	245	356	407	1,527
7	1,304	1,674	494	1,372	1,598	1,865	8,307
8	809	1,187	662	1,486	1,525	1,754	7,423
9	375	316	195	247	320	275	1,728
10	374	514	253	675	590	681	3,087
11	243	238	134	235	273	380	1,503
12	856	981	479	1,236	1,698	2,159	7,409
13	997	1,129	629	1,402	1,579	1,853	7,589
14	529	622	14	504	782	898	3,349
15	1,611	2,321	783	1,608	1,794	1,773	9,890
16	616	597	252	509	692	742	3,408
17	726	401	283	497	689	794	3,390
18	1,045	752	178	765	791	752	4,283
19	647	796	328	717	765	786	4,039
20	1,496	1,636	612	1,700	1,796	2,327	9,567
21	1,282	1,224	644	2,055	1,822	2,032	9,059
22	1,403	1,540	630	1,680	1,935	1,886	9,074
23	1,276	1,453	808	1,973	2,163	2,193	9,866
24	1,590	1,546	544	1,470	1,422	1,582	8,154
25	565	705	329	938	1,257	1,068	4,862
26	304	478	120	268	391	433	1,994
27	398	365	99	295	316	389	1,862
28	387	473	182	543	699	524	2,808
29	454	407	152	383	471	404	2,271

Source: Developed by LBFC staff from information published in the Safe2Say Something Annual Reports.

- **Cost to operate the program.** The figures illustrated in Exhibit 36 include the initial launch of the program (2019), operation of the crisis center, continuing education, program outreach, staffing, administrative, and support costs. Given the program's exponential growth, it is not surprising that program costs have also increased. There has been a 169 percent increase in program costs since the program began in January 2019.

Exhibit 36

Annual Cost to Operate the Safe2Say Something Program
(2018-19 to 2023-24)

Fiscal Year	Reported Cost*
2018-19	$743,428
2019-20	$1.6 million
2020-21	$1.66 million
2021-22	$1.66 million
2022-23	$1.92 million
2023-24	$2 million

Note:
*/ Figures are reported by OAG and are unaudited.
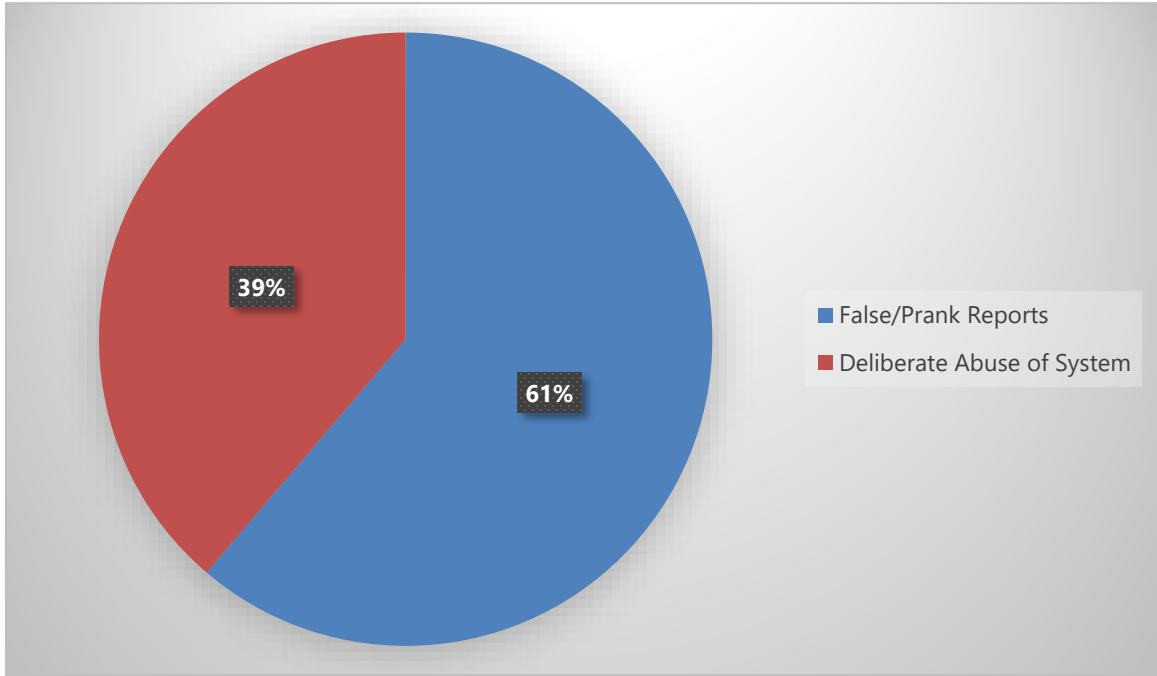Source: Developed by LBFC staff from information published in the Safe2Say Something Annual Reports.

- **False reports.** When a report is received, the assigned investigative analyst works to determine the report's validity. According to the OAG's annual report, false/prank reports are defined as being intentionally submitted to the S2SS but lacking a subject name. These reports are immediately identified as false or later identified as false/prank after an investigation occurs. A report that appears to have credible information but, after an investigation, is found to be untrue or intended to harm or cause disruption is classified as a deliberate abuse of the system.

  While false reports are rare, they must be investigated to determine their validity, which strains law enforcement and program resources. OAG encourages district attorneys to investigate false reports and file charges against those who place false tips and/or abuse the system. Additionally, OAG has a dedicated law enforcement staff that investigates false reports. According to the OAG, false reports strain the S2SS program and law enforcement. Depending on the circumstances of the report, the OAG and the District Attorneys may file charges against the reporter that, if found guilty, may result in fines and probation to imprisonment.

  From January 2019 through June 2024, the S2SS program received 147,808 reports, of which 6,721 (4.5 percent) were false/prank reports or deliberate system abuse. Exhibit 37 illustrates that of those 6,721 reports, 61 percent (4,116) were false/prank reports, and 39 percent (2,605) were deliberate system abuse.

Exhibit 37

False/Prank/Deliberate Abuse of the System Tips Received
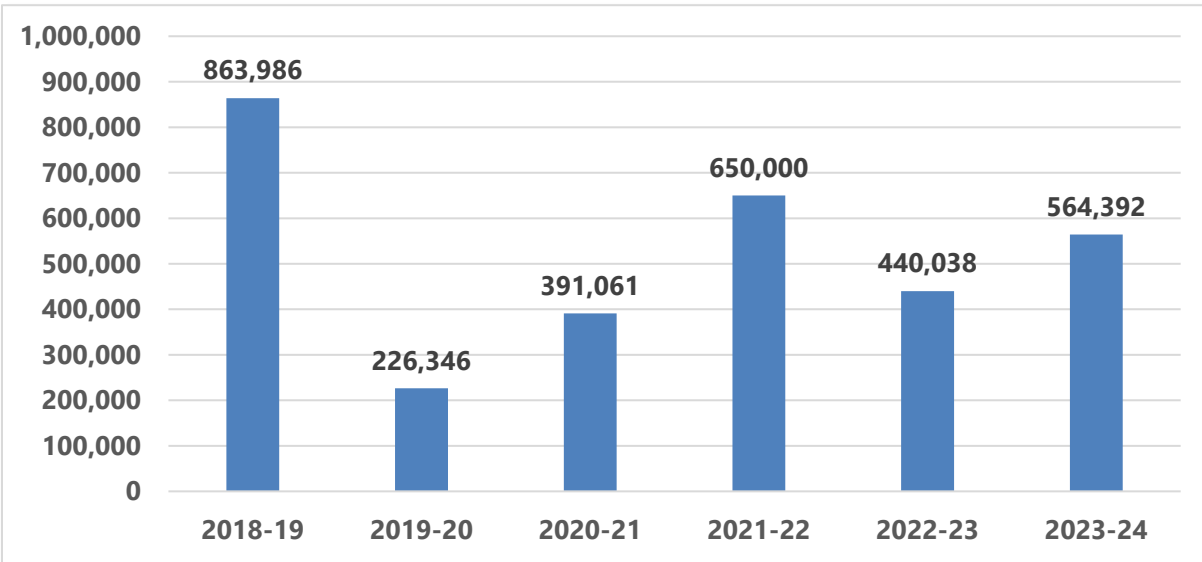**(2018-19 to 2023-24)**

Source: Developed by LBFC staff from information published in the Safe2Say Something Annual Reports.

- **Total number of schools and students trained.** Act 44 states that the S2SS program is responsible "to train or provide instruction to individuals, including but not limited to emergency dispatch centers and school entities, on appropriate awareness and response to the program." Exhibit 38 illustrates that 3,135,823 students have received S2SS training through self-led, in-person (taught by S2SS staff), or interactive video training since 2018. However, S2SS staff informed us that not all school entities in the commonwealth participate in training on the program, despite each school entity being required to have procedures in place to respond to a S2SS report. Anecdotally, S2SS staff told us that increased reporting by school entities typically occurs in the fall after staff provide training. We would have tested this observation if we had access to S2SS data

Exhibit 38

Number of Students That Have Received S2SS Training
(2018-19 to 2023-24)*

Note:
*/ On April 9, 2020, all schools closed for the remainder of the 2019-20 school year to prevent the spread of COVID-19. COVID-19 outbreaks continued to impact many school operations through the spring of 2021, as a result S2SS trainings were also impacted
Source: Developed by LBFC staff from information published in the Safe2Say Something Annual Reports.

In conclusion, based on analysis of the data contained in the annual reports, we found the S2SS program to be successful. For example, we found that the number of tips continues to increase, having reached its peak during the 2023-24 school year, a nearly 40 percent increase from the beginning of the program in 2018-19. Bullying/Cyber Bullying continues to be the top reported tip, with over 24,000 tips over the six years we reviewed. Text message reporting was added in the 2023-24 school year, which will likely further expand the program's success. Nevertheless, the primary reporting method continues to be directly through the S2SS website. Despite being short-staffed, we also found that the cost of implementing the S2SS program has increased by 169 percent from its inception. Of the approximate 148,000 reports received by the program, the number of false reports remains relatively low at a little over 6,700.

Finally, we must underscore that our analysis is based on unverified data. We anticipated being able to review source documentation to verify information in the annual reports and thereby provide further aggregated analysis. However, OAG repeatedly denied our requests for records, cit-

ing confidentiality provisions outlined in Act 44.[142] This difference remains today. In the end, while we recognize the significance of ensuring that S2SS tips/data are protected, we also strongly believe that a more robust data analysis should be conducted, particularly regarding tip dispositions. In support of this conclusion, we spoke with a researcher from the University of Michigan, who is actively studying anonymous tip reporting systems using data from North Carolina. The researcher noted that studying tipline outcomes is important as it demonstrates success in improving school climate and preventing violence.[143] In turn, this can lead to better relationship building between students and administrators.

Further, by using aggregated S2SS data and comparing it with PDE incident data, Pennsylvania Youth Survey results, and other available data metrics, a fuller picture can emerge regarding youth trends and the need to target additional school safety resources.

We recommend:

- **The General Assembly should consider amending section 1303-D of the Public School Code of 1949 to require school entities to resolve all S2SS tips within 30 days of receipt by the school entities.**

- **OAG should provide School Safety and Security Coordinators (see Issue Area B that follows) with advanced training on proper tip disposition procedures so that tips are tracked and resolved according to best practices established by OAG.**

- **The General Assembly should consider amending section 1309-B of the Public School Code to require School Safety and Security Coordinators to provide annual attestations to the OAG that S2SS disposition information is accurate.**

- **The General Assembly should consider amending section 1304-D of the Public School Code to allow**

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[142] Section 1304-D. Confidentiality. (a) Disclosure. – A record created or obtained through the implementation or operation of the program shall be confidential. A person may not disclose a record of the program except: (1) To provide notice to the appropriate law enforcement agency, school entity and organization in accordance with the procedures established under section 1303-D. (2) Upon order of the court as provided in section 1306-D. (b) Right-to-Know. – A record of the program: (1) shall not be subject to the act of February 14, 2008 (P.L.6, No.3), known as the Right-to-Know Law; and (2) does not create a record under 18 Pa.C.S. Ch. 91 (relating to criminal history record information). (c) Penalty. – An individual who discloses a record in violation of this section commits a misdemeanor of the third degree.

[143] *See* Thulin, Elyse, *Firearm-Related Tips in a Statewide School Anonymous Reporting System*, American Academy of Pediatrics, January 2024. Interview with LBFC staff on February 7, 2025.

aggregated and redacted data sharing with the Legislative Budget and Finance Committee so that performance audits on tip dispositions can be conducted every five years. These audits will help ensure that school entities are adhering to established procedures.

B. School Security Personnel

A 2022 Pew Research study found that approximately two-thirds (65 percent) of K-12 schools in the United States had one or more security personnel in school at least once a week during the 2019-20 school year, a figure that is 22 percent higher than the previous decade. The term school security personnel refers to three different types of security: a school police officer (SPO), a school resource officer (SRO), and a school security guard (SSG). The following sections focus on the different qualifications, training, roles, and authority of these three types of school security personnel.

Act 67 of 2019 amended Article XIII-C, Section 1301-C of the Public School Code of 1949 to define *School security personnel* as a general term that includes school police officers (SPOs), school resource officers (SROs), and school security guards (SSGs). Act 44 also required each school entity to appoint a" school safety and security coordinator." The school safety and security coordinator is appointed by the chief school administrator (i.e., a superintendent) to supervise school security personnel. A more detailed description of each position can be found in Exhibit 39.

Regarding the authority to carry firearms, Article XIII-C of the Public School Code identifies school security personnel, the umbrella definition which includes school police officers (SPOs), school resource officers (SROs), and school security guards (SSGs), all of which have definitions in the code. These three categories of school security personnel appear to be the only individuals permitted to carry firearms while performing their duties.[144] However, it is important to note that a court of common pleas judge must provide approval upon a request by the school entity to appoint an SPO to authorize the SPO to carry a firearm.[145] For SSGs to be armed, the SSG must be licensed under 18 Pa.C.S. Ch. 61 Subch. A relating to the Uniform Firearms Act[146] and be currently certified under the Lethal Weapons Training Act[147] unless they are active law enforcement

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[144] Act of March 10, 1949 (P.L.30, No.14), art. VIII-C, §§ 1302-C, 1313-C, 1314-C, 1316-C; 24 P.S. §§ 13-1302-C, 13-1313-C, 13-1314-C, 13-1316-C.
[145] *Ibid*, § 1302-C(b)(3).
[146] Act of June 13, 1995, Special Sess. 1 (P.L.1024, No.17).
[147] Act of October 10, 1974 (P.L.705, No.235) known as the Lethal Weapons Training Act.

officers who have completed MPOETC training requirements or retired law enforcement officers who are in compliance with § 8.1 of the Lethal Weapons Training Act and have been issued a firearm training and quali-fication card under § 5 of the Retired Law Enforcement Identification Act.[148]

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[148] Act of December 13, 2005 (P.L.432, No.79), known as the Retired Law Enforcement Identification Act.

Exhibit 39

School Security Personnel Categories*

	School Police Officer (SPO)	School Resource Officer (SRO)	School Security Guard (SSG)
Public School Code Definition	A law enforcement officer, whose responsibilities and work hours are established by the school entity or non-public school, or an independent contractor or individual provided by a third-party vendor who has been appointed under Section 1302-C. A school entity or nonpublic school may apply to a judge of the court of common pleas of the county the school entity is located to appoint a person or persons to act as a school police officer for the school entity or nonpublic school.	A law enforcement officer, including an active sheriff or deputy sheriff, commissioned and employed by a law enforcement agency whose duty station is in a school entity or nonpublic school per a written agreement between the school entity or nonpublic school and the law enforcement agency, county, or the sheriff's office.	An individual employed by a school entity, nonpublic school, or a third-party vendor or an independent contractor who is assigned to a school for routine safety and security duties and has not been granted powers under section 1306-C (a) (3) or (b).
School district employee?	Maybe (services might be contracted).	No (officer remains a member of local law enforcement agency per terms of a memorandum of understanding).	Maybe (services might be contracted).

	School Police Officer (SPO)	School Resource Officer (SRO)	School Security Guard (SSG)
Powers and Duties	The powers and duties are determined by the Court of Common Pleas and may include the following: Issues citations for summary offenses and may detain and/or arrest individuals. May exercise the same powers as police officers in the municipality the school property is located. Acts as enforcement within school buildings, buses, and school grounds.	Assists in identifying physical changes to the school environment. Assists in developing school policies relating to crime. Educate and train students in safety and crime prevention and awareness. To train students in conflict resolution. Addresses crime, violence, and drug activity in school buildings and surrounding areas.	Additional school campus supervision. Assists with disruptive students. Monitors school visitors. Works in conjunction with SPOs and SROs.
Training	Act 120 (Municipal Police Officers' Education and Training Commission – MPOETC) certified. Must attend 12 hours of Act 120 training annually. National Association of School Resource Officers (NASRO) Basic School Resource Officer Course, or an equivalent course approved by the SSSC. Graduated from the Pennsylvania State Police Academy – has been employed with and is separated from the Pennsylvania State Police. Individual needs to have separated from their service in good standing, as required by § 1305-C(a)(1) of the PSC.	MPOETC Act 120. NASRO Basic School Resource Officer Course, or an equivalent course approved by the SSSC.	NASRO Basic School Resource Officer Course, or an equivalent course approved by the SSSC. If armed: licensed under the Uniform Firearms Act and completion of Lethal Weapons Training Act, unless an active law enforcement agent in compliance with MPOETC training or have been issued a firearm training and qualification card under the Retired Law Enforcement Identification Act.

	School Police Officer (SPO)	School Resource Officer (SRO)	School Security Guard (SSG)
Carry a firearm	Yes (if certain training requirements are met). If granted by a Court of Common Pleas Judge in the county the school property is located, upon request by the school entity.	Yes.	Yes (if certain training requirements are met).

Note:
/See Act of March 10, 1949 (P.L.30, No.14), art. VIII-C, §§ 1302-C, 1305-C, 1309-B, 1310-B 1313-C, 1314-C, 1316-C; 24 P.S. §§ 13-1302-C, 13-1313-C, 13-1314-C, 13-1316-C.
Source: Developed by LBFC staff from review of the Public School Code and information provided by the Pennsylvania School Resource Officers' Association.

School Safety and Security Coordinator

Created by Act 44 of 2018, a school safety and security coordinator is an administrator responsible for the entity's security personnel and ensuring that the entity's policies and procedures comply with state law. The coordinator oversees all security personnel and reports directly to the chief school administrator.[149]

In addition to reviewing the school entity's safety and security policies and procedures, the school safety and security coordinator is responsible for:

- Coordinating training and resources for students and school staff relating to situational awareness, trauma-informed approaches, behavioral health awareness, suicide and bullying awareness, substance abuse awareness, and emergency procedures and training drills.

- Creating a report on the school entity's current safety and security procedures, as well as a report on the current school security personnel. Both reports are presented to the school entity's board of directors and submitted to the SSSC by June 30 each year.

- Coordinate a biennial tour of the school's buildings and grounds and discuss and coordinate school safety and

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[149] The chief school administrator is the superintendent of a public school district, executive or administrative director of a career and technical education center, executive director of an intermediate unit, or chief administrator of a charter school, including a cyber charter school.

security matters with local law enforcement agencies and first responders.

- Coordinate school safety and security assessments as necessary.

- Serve as the school entity liaison with the SSSC, the department, law enforcement, and other organizations on matters of school safety and security.

Section 1309-B requires school safety and security coordinators to complete training created by the SSSC (Section 1316-B). PCCD provides school safety and security coordinator training, which may not exceed seven hours (one seven-hour training session). According to Act 55 of 2022, the training shall include:

- Physical assessments and physical security.
- Emergency preparedness.
- Leadership.
- Coordination and communication with law enforcement and emergency personnel.
- Appropriate staffing.
- Situational awareness.
- Trauma-informed approaches.
- Behavioral health awareness.
- Suicide and bullying awareness.
- Substance use disorder awareness.
- Emergency procedures and training drills, including fire, natural disasters, active shooters, hostage situations, and bomb threats.

Lack of Certification. An important distinction is that unlike other school positions, the School Safety and Security Coordinator position does not require professional certifications, qualifications, or credentials other than the approximate seven hours of training required by Act 55 of 2022.

A representative with extensive experience in school safety expressed concern about the increasing demands placed on the school safety security coordinator position and the lack of professionalization within the role. He noted the following to us:

> The issue....is that we've created a position of some importance out of thin air and placed the onus of responsibility on the school entity to meet the obligation. I would defy anyone, however, to identify a position of responsibility within any school that does not require some professional credential as an entry-level qualification. Teachers, administrators, counselors, business

managers, HR, nurses, etc., all have some credentials attached to them. Other positions, like coaches, may not require credentials. Still, in many cases, credentials are available or can be listed as a prerequisite or condition of continued employment if the district chooses.

Other representatives also expressed similar concerns, including the lack of funding and the availability of qualified personnel to fill the position as concerns. As discussed later in Section VI, to further improve and professionalize the school safety and security coordinator position, **we recommend Act 44 be amended to create a certification similar to other nationally recognized professional accreditations, whereby individuals could submit existing coursework (FEMA ICS courses, threat assessment training, certification as an emergency manager, etc.) and relevant work experience (law enforcement, fire, EMS, emergency manager, school leadership, etc.) to earn a credential.**

School Police Officer (SPO)

By definition, a school police officer (SPO) is a law enforcement officer employed by a school entity or nonpublic school. SPOs can also be independent contractors[150] or hired through a third-party vendor.[151] School police officers are authorized by a school entity requesting a judge from the respective county court of common pleas to authorize the SPO's powers.

A school district employing an SPO must annually report the identity of all SPOs, and the date and type of training each SPO has attended and completed to PDE, the SSSC, and PCCD. At the school's request, the judge can grant the SPO the authority to carry a firearm if they complete the necessary training requirements.

Training. An SPO is typically (although not necessarily) a retired law enforcement officer who either graduated from the Pennsylvania State Police Academy or completed the Municipal Police Officers' Education and Training Commission's (MPOETC) Act 120 training course.[152] In addition, SPOs must complete the National Association of School Resource Officers (NASRO) Basic School Resource Officer Course, or an equivalent

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[150] An independent contractor is an individual, including a retired federal agent or retired state, municipal or military police officer or retired sheriff or deputy sheriff, whose responsibilities, including work hours, are established in a written contract with a school entity or nonpublic school to perform school security services.

[151] A third-party vendor is a company or entity approved by the Pennsylvania Commission on Crime and Delinquency, that provides school security services.

[152] The MOPETC Act 120 course is a 919-hour training that consists of five models and 19 sections that all potential municipal police officers must complete before beginning as police officers.

course of instruction approved by the SSSC, before beginning their duties.[153] Exhibit 40 outlines the specifics of the NASRO course. Title 53 (Municipalities Generally) Chapter 21, Subchapter D requires all SPOs to attend 12 hours of in-service training under Act 120 requirements for annual firearms qualification and CPR/AED/First Aid certification.

<div align="center">

Exhibit 40

NASRO Basic School Resource Officer Course Outline*

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Course Title	Course Description
1. **Foundations of School-Based Law Enforcement**	- History and evolution of school-based policing. - Best practices for school safety. - Learn the NASRO TRIAD model of school-based policing: law enforcement officer, informal counselor/mentor, and public safety educator.
2. **The SRO as Informal Counselor/Mentor**	- Create and maintain positive and influential relationships with students. - Learn informal counseling and mentoring strategies. - Gain an understanding of the Family Educational Rights and Privacy Act (FERPA) to protect student confidentiality.[a] - Develop connections with students, parents, staff, and the community.
3. **The SRO as Public Safety Educator**	- Learn skills for effective public speaking. - Identify public safety topics for lessons and presentations.
4. **School Law**	- Become a specialist in school-related law. - Learn student behaviors, rights, and activities that will assist in making daily decisions.
5. **Ethics and the SRO**	- Increase awareness of ethical considerations - Build trust in the school community. - Understand how discretion foreseeability, and flexibility guide ethical behavior.
6. **Adolescent Brain Development**	- Learn the stages of puberty and adolescent brain development.

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[153] The NASRO Basic School Resource Officer Course is a five-day, 40-hour training course that prepares school security personnel with the knowledge and tools to serve the school environment and community.

	- Learn how brain development affects emotions, thinking, behavior, decision-making, and social functioning. - Learn how puberty and brain development affect egocentrism, impulsivity, and risk-taking.
7. **Supporting Students with Disabilities**	- Learn about students with disabilities, behaviors associated with certain disabilities, and laws surrounding students with disabilities. - Learn the federally mandated discipline process for students with disabilities vs. non-disabled students. - Learn response and de-escalation strategies to deal with students with disabilities.
8. **Building a Positive Digital Culture**	- Review digital media platforms and how they affect students and society. - Learn the negative effects and inappropriate use of digital culture and the challenges they pose to the school environment. - Learn how to handle social media issues such as cyberbullying, pornography, fake news, and "sexting."
9. **Trauma-Informed Practices**	- Learn how to use knowledge, empathy, and best practices when dealing with a student with traumatic stress. - Define three types of stress and how they impact behavior and brain development. - Learn the signs of traumatic stress. - Learn best practices when dealing with traumatized or victimized students.
10. **Human Trafficking: Protecting our Students**	- Understand what human trafficking is. - Learn the emotional and physical signs and risk factors of human trafficking. - Identify local agencies that assist with human trafficking education, prevention, reporting, and victim support services.
11. **Behavioral Health (Mental Health Suicide and Substance Abuse)**	- Learn student behaviors associated with mental illness, suicidal ideation, and substance abuse. - Learn how to educate the community on behavioral health issues. - Define mental health disorders.

	- Recognize suicidal indicators and how to help.
	- Recognize substance abuse indicators and how to help.
12. Behavioral Threat Assessment	- Review school threats and violence over the past decade.
	- Identify factors that could prevent, lead to, or pose a serious threat to students, staff, and the safety of the school.
	- Learn to identify and make decisions on threats of varying degrees.
	- Identify behaviors that may cause the need for an assessment.
13. Developing and Supporting Successful Relationships with Diverse Students	- Provide awareness of biases with diverse school populations.
	- Learn strategies for creating, fostering, and maintaining relationships with diverse school groups.
14. Verbal De-Escalation	- Reviews verbal de-escalation.
	- Addresses stressors that may escalate violent behavior.
	- Learn de-escalation skills.
	- Review the National Institute of Justice's "Use of Force Continuum."
15. School Emergency Operations Planning: Navigating a School Crisis	- Learn the four phases of emergency management.
	- Learn how to develop, maintain, and implement an Emergency Operations Plan.
	- Identify state, local, and federal resources available for emergency operations.
16. Armed Assailant Response	- Review past school tragedies to focus on lessons learned.
	- Learn protocols and procedures to neutralize a threat and save lives.
	- Learn best practices to train students and staff on lifesaving skills.

Notes:
*/ Reflects only the NASRO Basic course outline and does not recognize the equivalent course of instruction standards approved by the SSSC and outlined in Sections 1305-C, 1313-C, 1314-C, and 1315-C of the PSC. The SSSC is tasked with coordinating with the PSP to approve and review an equivalent set of training standards for the NASRO Basic School Resource Officer Course, and to approve providers who meet those standards.
a/ Family Educational Rights and Privacy Act (FERPA), is a federal law that protects the privacy of student education records.
b/ The International Center for Digital Threat Assessment (ICDTA) partners with Safer Schools Together (SST) to give Safety and Threat Assessment Teams training and tools to identify threatening behavior and intervene before tragedy

strikes. Safety and Threat Assessment Teams can access the Digital Threat Assessment (DTA) to determine the validity and level of threat risk and how to intervene to prevent the threat from occurring.
Source: Developed by LBFC staff from the NASRO Basic School Resource Officer Course Outline.

Duties and Powers. Once appointed, an SPO can enforce order in school buildings, on school buses, and on school grounds within the school entity. If the appointing judge grants authorization, an SPO can issue summary citations and detain individuals. SPOs that are law enforcement officers employed by the school entity may exercise the same powers as those law enforcement officers within the municipality of the school's location if authorized by the court.

School Resource Officer (SRO)

An SRO is an active law enforcement officer stationed within the school entity per an agreement between the local law enforcement agency (e.g., municipal police authority) and the school entity. An SRO can also be a certified sheriff or deputy sheriff assigned to a school entity via an agreement between the school entity, the sheriff's office, and the county[154].

As part of our work on this study, we met with representatives from the Pennsylvania branch of NASRO (PASRO) at their annual training conference. During this meeting, the officials informed us that it is important to understand that school police work differs from typical law enforcement. School policing may not be a suitable fit for all law enforcement officers. NASRO suggests that a candidate for an SRO position have a minimum of three years of law enforcement experience, a desire to work with youth, a clean disciplinary record, and prior participation in youth programs.

PASRO also informed us that effective SROs avoid arresting students unless necessary. They work to build relationships with students and try to avoid the school-to-prison pipeline by getting them the help they need within the school or community.

These points were also emphasized at a recent Pennsylvania House Education Committee hearing on school safety. At that hearing, an SRO testified to the many advantages of having an SRO within schools, the most critical of which is their ability to respond to emergencies immediately. Other advantages of having an SRO in the building are their knowledge of the school's layout and familiarity with the procedures of school staff and emergency services.

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[154] Act 67 of 2019 added certified sheriff or deputy sheriff to the definition of school resource officer.

Training. All SROs must complete the NASRO Basic Resource Officer Course outlined in Exhibit 40, or an equivalent course of instruction approved by the SSSC. This course is in addition to the MPOETC (Act 120) training that all municipal police officers must take before becoming a police officer. Exhibit 41 outlines the 919-hour, five-module, 19-volume Act 120 training.

Exhibit 41

Municipal Police Officer Basic Training Program (Act 120)

Module 1	Module 2	Module 3	Module 4	Module 5
• Introduction to the Academy • Introduction to Law Enforcement in Pennsylvania • Laws & Criminal Procedure	• Juveniles • Human Relations • Responding to Special Needs • Homeland Security • Vehicle Code Enforcement • Crash Investigations	• Patrol Procedures and Operations • Criminal Investigation • Drug Law Enfocement • Case Presentations	• Operation of Patrol Vehicles • Physical and Emotional Readiness • Control Tactics • Firearms • Emergency Response Training	• Scenarios and Practical Exercises

Source: Developed by LBFC staff with information from MPOETC course curriculum overview.

Duties and Powers. Under the Public School Code, the school entity determines the powers and duties of the SRO, which may include the following:

- Assist with identifying any physical change in the school's environment to reduce crime in or around the school.
- Assist in the development of school policies addressing crime.
- Educate students in crime prevention, safety, conflict resolution, restorative justice, and awareness.
- Address crime, violence, gangs, and drug activity in or around the school.
- Develop community justice initiatives for students.

School Security Guards (SSG)

Section 1301-C of the Public School Code defines a school security guard as an individual employed by a school entity or nonpublic school, or an independent contractor hired or contracted by a school entity or third-party vendor to carry out routine safety and security duties at a school. Importantly, SSGs do not have the same powers and duties as SPOs, and certainly that of SROs. As an example, SSGs' responsibilities include the following:

- Providing school safety support services.
- Enhanced campus supervision.
- Assistance with disruptive students.
- Monitoring school visitors.

SSGs complete the NASRO Basic School Resource Officer Course outlined in Exhibit 40, or an equivalent course of instruction approved by the SSSC.[155] Although SSGs do not have the same authority as SROs or SPOs, Act 91 of 2019 allows school entities to arm SSGs. Armed SSGs must be licensed under Title 18 (Crimes and Offenses) Chapter 61 (Firearms and Other Dangerous Articles) Subchapter A (Uniform Firearms Act), complete Lethal Weapons Training (Act 235 of 1974), and be cleared to work with children under Sections 111 and 111.1 of the Public School Code and Title 23 (Domestic Relations), Section 6334.

There are exceptions to the training for those SSGs who are active or retired law enforcement officers. An active law enforcement officer working as an SSG is exempt from the training requirements once proof of completion of training under Title 53 (Municipalities Generally) Chapter 21 (Employees) Subchapter D (Municipal Police Education and Training) is provided. A retired law enforcement officer working as an SSG will be exempt from the training requirements upon proof that they have complied with Section 8.1 of Act 235 of 1974 and have a firearm training and qualification card issued under Act 79 of 2005 (Retired Law Enforcement Identification Act).

C. School Security Personnel Staffing Requirements

As described in the previous section, Pennsylvania school security personnel include SPOs, SROs, SSGs, or any combination thereof. Importantly, before July 2024, school entities deployed security personnel according to each district's needs.

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[155] Article XIII-C (School Security) Section 1314-C (b)(1) of Act 14 of 1949.

Act 55 of 2024 Imposes New Security Staffing Requirement

With the enactment of Act 55 (Act 55 of 2024), new staffing requirements for school districts were imposed. Specifically, Act 55 (2024) required every school district to employ at least one full-time, fully trained school security person beginning with the 2024-25 school year. A school district that cannot hire a qualified individual may apply to the SSSC for a waiver, which expires after one year.

Eligibility for the waiver requires a school district to submit an attestation to the SSSC stating that it acted in good faith but was unable to hire or contract with an SPO, SSG, or law enforcement officer from an accredited police force or that there is no municipal police department or local law enforcement agency that can provide an SRO.

Further, Act 55 of 2024 allows school districts to use funding from the School Safety and Security Grant Program to cover the costs associated with training and salaries of school security personnel. The act also created Section 1316.1-C, establishing the School Security Personnel Restricted Account within the School Safety and Security Fund. If funded in FY 2025-26, this restricted account will reimburse school districts for employing at least one school resource officer, school police officer, or armed security guard (maximum of $50,000).

School District Compliance with Staffing Requirement

With more than 500 school districts, Act 55 was an important challenge, especially for many smaller school districts that did not have security personnel. To this point, at a September 2024 SSSC meeting, a committee member inquired about waiver requests for the Act 55 (2024) school security staffing requirement. PCCD staff indicated that data was available from the PDE and that further research may be needed, including the possibility of a district survey.[156]

Later, during the November 26, 2024, monthly SSSC meeting, PCCD staff informed the committee a waiver process had been adopted, including an online application. Staff further noted that since September 2024, PCCD has received just 33 waiver applications, which the SSSC approved during the November 2024 meeting. In addition, PCCD requested that the SSSC give it the authority to continue approving waivers as applications are received, with the understanding that PCCD would keep the

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[156] Staff also cited concern that the data was self-reported by school entities.

SSSC informed of how many applications are received and waivers approved, to which the SSSC agreed. The motion was approved.

We were interested in determining how many school districts may be affected by Act 55's staffing requirements and the overall distribution of school security personnel. To answer this objective, we relied upon public-facing data from PDE, specifically the Annual School Safety Report. Through this report, data is aggregated by the school district for various topics including, but not limited to:

- Fire-Security Drills
- Disciplinary Actions
- Infractions, and
- Security Staff

Using data from the Annual School Safety Report, we focused on "Security Staff," from which we determined the number of school police officers (SPOs), school resource officers (SROs), and school security guards (SSGs) reported by LEA. We obtained reports for school years 2018-19 through 2023-24, presented in Exhibit 42. Our analysis includes school districts and school entities; however, it is important to highlight that Act 55's requirement for school security personnel is limited to school districts.[157]

Exhibit 42

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[157] Per section 1316-C of the Public School Code a school entity for purposes of this requirement is a school district.

School Security Personnel
(2018-19 to 2023-24)
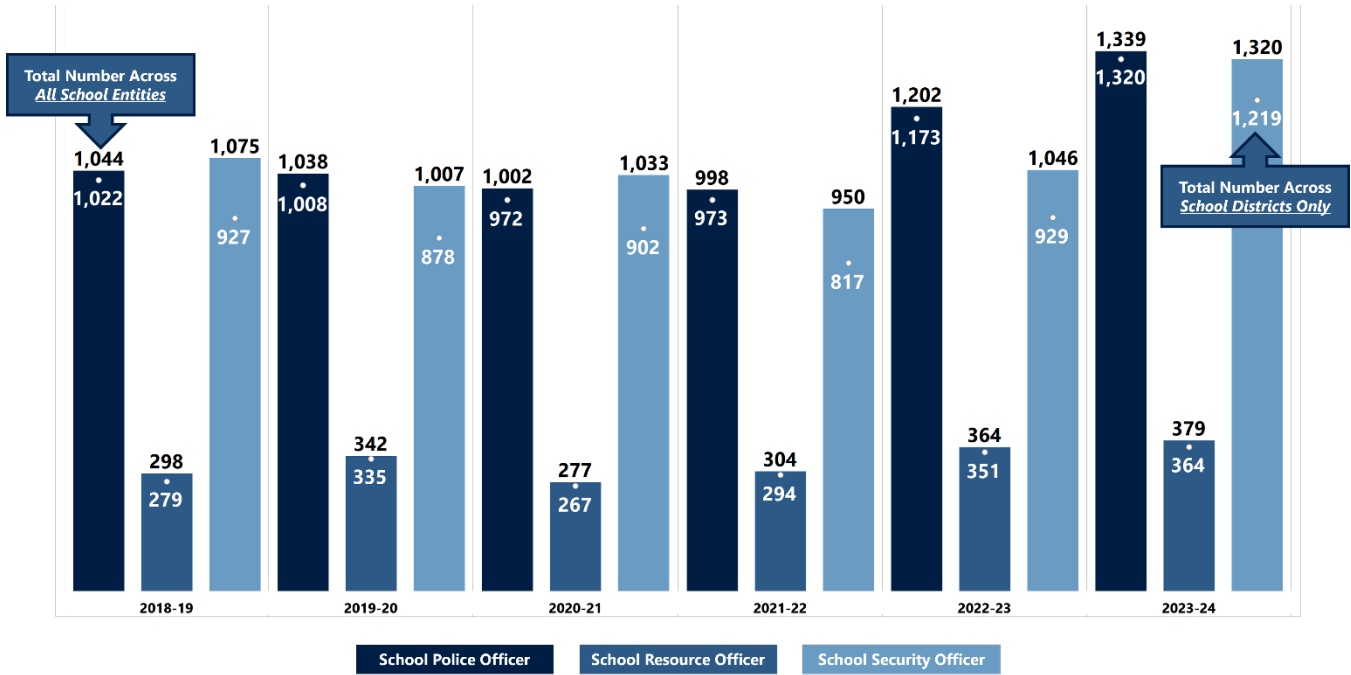
Source: Developed by LBFC staff from data provided by the Pennsylvania Department of Education.

As illustrated in Exhibit 42, the use of school security personnel remained steady overall. There were 2,417 school security personnel across the state during 2018-19, which rose 26 percent to 3,038 in 2023-24. SPOs, SROs, and SSGs increased by 28 percent, 27 percent, and 23 percent, respectively, from 2018-19 to 2023-24.

The number of school districts with security personnel should increase due to Act 55 of 2024. As noted above, Act 55 requires every school entity to have at least one full-time, fully trained security personnel on duty during the school day. School districts reserve the right to request security personnel be in attendance for after-hours extracurricular activities.

Further adding to the waiver requirement is that during the November 2024 SSSC meeting, the PCCD also informed the SSSC that it encourages any school district with just one school security personnel to apply for a waiver. The rationale is that to comply with Act 55 of 2024, a school district must have full-time school security personnel on duty during school hours.[158] As a result, if the school security is on leave, the school district is technically not compliant with the law. Applying for the waiver in these

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[158] Act 55 of 2024 designates $100 million for the School Safety and Security Grant Program for school safety and mental health grants.

circumstances would provide the entity time to hire additional personnel to cover these circumstances.

To estimate possible waiver applications, we reviewed data from PDE to identify school entities lacking school security personnel. We found that over half of the reporting school entities had no security personnel. As illustrated in Exhibit 43, in 2018-19, 490 school entities reported no security personnel; however, through 2023-24, this number declined by 10.2 percent, reaching a low of 440 schools.

With respect to only school districts, in 2018-19 there were 267 school districts without school security personnel. By 2023-24 that number continued a steady decline to 226 school districts without school security personnel, a sharper decline of 15 percent.

Exhibit 43

**Number of School Entities/School Districts
Reporting NO Security Personnel
(2018-19 to 2023-24)**
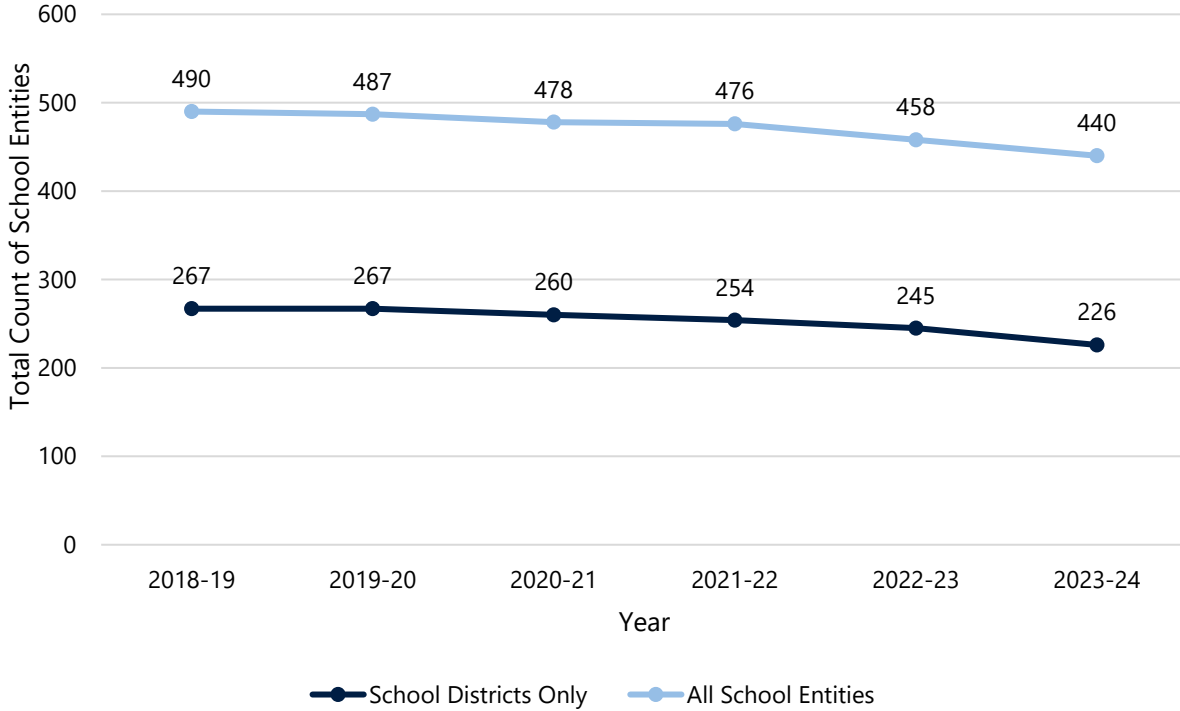
Source: Developed by LBFC staff with information from the Pennsylvania Department of Education.

We used the school security personnel data from PDE and applied the market value/personal income aid ratio (MV/PIAR) for each school district to determine a correlation between the number of school security personnel and socioeconomic status.[159] Using a regression analysis, we found a slight, but statistically significant, correlation between the MV/PIAR and the number of school security personnel in each school district. Between 2018-19 and 2023-24, we found that, in general, a one-percentage-point increase in the MV/PIAR was associated with a 0.07 increase in the number of school security personnel.[160]

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[159] The market value/personal income aid ratio (MV/PIAR) is calculated per Section 2501(14), (14.1), and (14.2) of the School Code and represents the relative wealth (market value and income) with the state average for each student in a school district. This ratio is used in several state subsidies, such as the Pupil Transportation Subsidy.
[160] By "regression analysis," we refer to bivariate regression analysis, comparing one independent variable (MV/PIAR) and one dependent variable (number of school security personnel) without any control variables. Note that (1) there may be other variables besides or in addition to MV/PIAR that may contribute to changes in the total number of school security personnel in school districts, and (2) correlation does not imply causation. MV/PIAR numbers in our regression analysis were converted into percentages. We found that the Pearson correlation coefficient of MV/PIAR numbers and the total number of school security personnel was 0.06, indicating a negligible correlation between

Our analysis found a positive correlation between the MV/PIAR ratio and an increase in disciplinary incidents in schools, as well as a connection between increases in the number of reported incidents and the number of school security personnel.[161] It is possible that the increase in the number of incidents *reported* is a result of the increase in the number of school security personnel in some districts. Stated differently, with more personnel on-site to monitor school grounds, there is a greater capacity to capture incidents.

D. School District Incident Data

One important school security and safety measure is "incident data" reported to the Pennsylvania Department of Education (PDE). As discussed in the last issue area, each LEA must report incidents within its boundaries. As part of the PDE's data collection and validation processes, incident data for each LEA is expanded to include details of each incident, such as any disciplinary actions, parent involvement, offenders, and any presence of weapons.

PDE Incident Data

Overview of the Incident Data. We obtained PDE's annual reports for each local education agency (LEA) for 2018-19 through 2023-24.[162] One complicating factor we found is that the total number of LEAs in PDE's reports changed yearly. For example, over 20 LEAs in one or more of PDE's annual reports opened or ceased operations between 2018-19 and 2023-24.[163] Nevertheless, the following total entities reported data to PDE (by school year):

- 2018-19: 776

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these two variables. The Pearson correlation coefficient is measured between negative one (i.e., perfectly negatively correlated) and positive one (i.e., perfectly positively correlated). Zero indicates that there is no relation between the variables.

[161] For every one percent increase in the MV/PIAR ratio, we found disciplinary incidents-per-100 student enrollments increased by 0.2. Our analysis also showed that for each increase of one security personnel in schools, there was a 0.05 increase in the number of incidents-per-100 student enrollments. A broader discussion on school incident data can be found in the following section.

[162] According to PDE, a local education agency refers to "a board of education or other legally constituted local school authority having administrative control and direction of public elementary or secondary schools in a city, county, township, school district, or political subdivision in a state, or any other public educational institution or agency having administrative control and direction of a career and technical education program. This term includes state correctional education agencies." The types of local education agencies included in PDE's infraction data include public school districts, charter schools, career and technical centers, and intermediate units.

[163] The status of these LEAs is based on the information published on PDE's database of "Educational Names & Addresses" (abbreviated "EdNA").

- 2019-20: 775
- 2020-21: 774
- 2021-22: 776
- 2022-23: 774
- 2023-24: 772

The LEA annual infraction data is divided into three parts as follows:

- Total number of incidents, student enrollments, and offenders.

- Incident type/category[164] (e.g., assault, harassment/intimidation, criminal trespassing, theft, academic dishonesty, possession of weapons, controlled substances, or alcohol).

- The number of incidents that (1) were reported to the local law enforcement, (2) resulted in arrest, and/or (3) led to students being assigned to an alternative education.

Incident Data Validation Process. LEAs must accompany their incident data with the accuracy certification statement (ACS). LEAs submit their ACSs to verify the accuracy of the data they submit to PDE, and a superintendent must sign each LEA's ACS. According to PDE, 48 LEAs in 2021-22 and 9 LEAs in 2022-23 submitted incomplete ACSs in which a superintendent's signature was absent. In 2023-24, there were 98 LEAs for which a superintendent did not sign the attestation for its annual incident data.[165] PDE notifies the LEA via email if an ACS is absent.

Each LEA must have its incident data signed by local law enforcement. PDE informed us that 53 LEAs in 2021-22, 46 LEAs in 2022-23, and 33 LEAs in 2023-24 had their data refused to be signed by their respective local law enforcement.

According to PDE, the number of schools reporting/submitting their annual data to the agency has been 100 percent compliant across the state, and all school-level data is imported through the Pennsylvania Information Management System. However, PDE occasionally needs to contact a school entity to obtain its ACS.[166]

Analysis. We calculated incident-to-enrollment ratios for each entity by year from 2018-19 to 2023-24.[167] We also calculated the mean across all school districts and entities to determine the average incident-to-en-

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[164] There are over 40 incident types/categories in the incident data.
[165] According to PDE's email from November 27, 2024, for the 2023-24 data, "the entities listed have not 'completed' the process but may be at different stages of finalization processing through [PDE's] system."
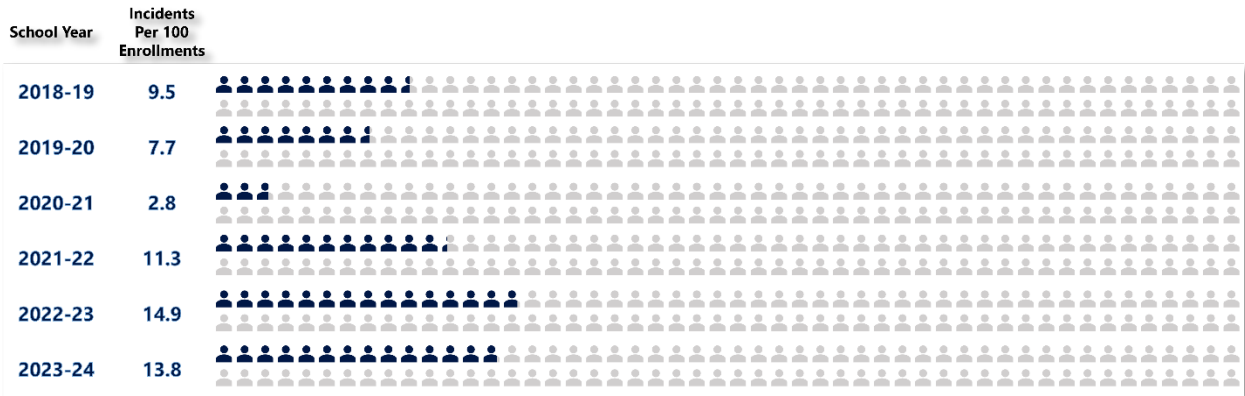[166] Per email with staff from the Pennsylvania Department of Education, October 23, 2024.
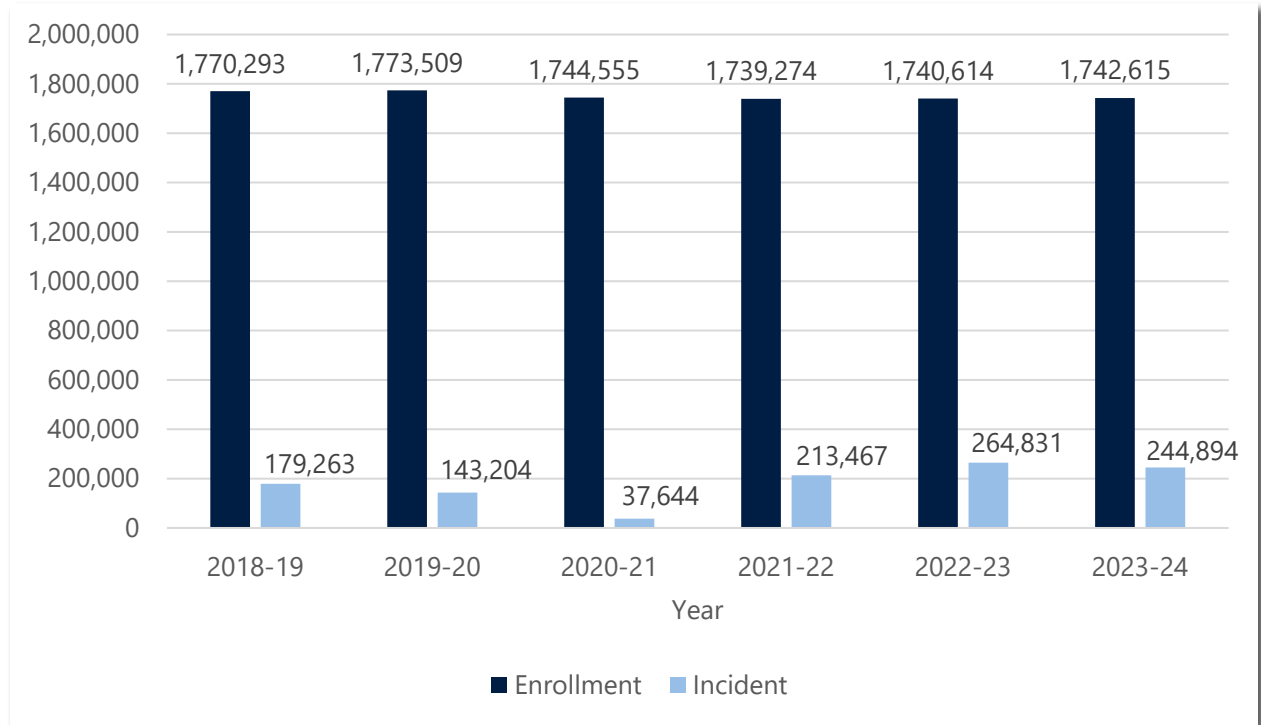[167] PDE's incident data uses the term "enrollment" as opposed to the term "students."

rollment rate for each school year. Exhibit 44 provides the average incident-to-enrollment ratios and the total number of incidents and enrollments for each school year from 2018-19 to 2023-24.

Exhibit 44

Average Incident-per-100 Enrollments by School Year

School Year	Incidents Per 100 Enrollments
2018-19	9.5
2019-20	7.7
2020-21	2.8
2021-22	11.3
2022-23	14.9
2023-24	13.8

Total Number of Incidents and Enrollments by School Year

Year	Enrollment	Incident
2018-19	1,770,293	179,263
2019-20	1,773,509	143,204
2020-21	1,744,555	37,644
2021-22	1,739,274	213,467
2022-23	1,740,614	264,831
2023-24	1,742,615	244,894

Source: Developed by LBFC staff with information from the Pennsylvania Department of Education.

We found that, on average, there were 9.5 incidents per 100 enrollments in 2018-19. This number declined in the school years leading up to the

COVID-19 pandemic, reaching 2.7 incidents per 100 enrollments in 2020-21. In 2022-23, the rate rose to 14.9 incidents per 100 enrollments, noting a 57-percent increase from the 2018-19 counterpart. The rate declined 7.4 percent to 13.8 incidents per 100 enrollments in 2023-24.

Moving beyond the review of incidents to enrollments, we also calculated the top reported incident categories. As shown in Exhibit 45, the overwhelming number of incidents reported were violations of the school's code of conduct. According to PDE, "School Code of Conduct" typically refers to a "repeated minor action of a student that accumulates to the need for a discipline response over time."[168]

Exhibit 45

Top Five Incident Categories by School Year*

2018-19	
School Code of Conduct	106,852
Possession, Use or Sale of Tobacco	11,876
Fighting	10,861
Minor Altercation	6,745
Disorderly Conduct	5,772

2019-20	
School Code of Conduct	89,331
Fighting	8,243
Minor Altercation	5,044
Disorderly Conduct	4,967
Simple Assault on Student	4,571

2020-21	
School Code of Conduct	22,824
Possession, Use, or Sale of Vaping Materials	3,039
Possession, Use or Sale of Tobacco	1,631
Fighting	1,374
Possession/Use of a Controlled Substance	1,092

2021-22	
School Code of Conduct	139,646
Possession, Use, or Sale of Vaping Materials	12,055
Fighting	10,746
Minor Altercation	6,303
Disorderly Conduct	5,005

2022-23	
School Code of Conduct	178,013
Possession, Use, or Sale of Vaping Materials	14,609
Fighting	11,331
Minor Altercation	6,992
Possession/Use of a Controlled Substance	6,233

2023-24	
School Code of Conduct	164,611
Possession, Use, or Sale of Vaping Materials	12,916
Fighting	11,494
Minor Altercation	6,664
Possession/Use of a Controlled Substance	5,657

Note:

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[168] PDE also provided us with the following definition of "Course of Conduct": "A pattern of actions composed of more than one act over a period of time, however short, evidencing a continuity of conduct. The term includes lewd, lascivious, threatening or obscene words, language, drawings, caricatures or actions, either in person or anonymously. Acts indicating a course of conduct which occur in more than one jurisdiction may be used by any other jurisdiction in which an act occurred as evidence of a continuing pattern of conduct or a course of conduct."

*/ The first and second columns for each table present the incident categories and the total number of incidents, respectively. According to PDE, an incident can contain one or more incident categories (e.g., simple assault on a student and fighting).
Source: Developed by LBFC staff from data provided by the Pennsylvania Department of Education.

In 2018-19, 106,852 incidents related to the school code of conduct were reported. However, that figure rose to 178,013 in 2022-23, marking a 67 percent increase. Other frequently reported incident categories included possession, use, or sale of tobacco and vaping materials and fighting. School code of conduct and fighting incidents were consistently reported over the review period. We also found that, except in 2020-21, over 10,000 incidents were reported to local law enforcement every school year.[169]

The COVID-19 pandemic likely contributed to a significant reduction in incidents. For example, in 2019-20, 143,204 incidents were reported. In 2020-21, just 37,644 incidents were reported, a 73.7 percent decrease. Subsequently, there were 213,467 incidents in 2021-22, an increase of 467.1 percent. The incident figure also increased in 2022-23 (264,831 incidents), albeit at a lower margin. The incident figures following 2020-21 were notably higher than those reported in 2018-19. PDE reported 244,894 incidents in 2023-24, marking a decline of 7.5 percent.

In contrast to fluctuations in incident figures over the years, the number of enrollments has generally remained stagnant. The enrollment figures have consistently hovered between 1.7 million and 1.8 million. The percentage changes in enrollments have typically been smaller than the percentage changes in incidents. Notably, from 2021-22 to 2022-23, enrollment was only a 0.08 percent increase. However, there was a 24.1 percent increase in incidents during the same period.

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[169] The Pennsylvania Department of Education's data labels these types of incidents under the column "Local Law Enforcement Contacted" in the incident data.

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SECTION VI
OPTIONS FOR FUTURE CONSIDERATION

Overview

A ct 44 has undoubtedly improved school safety in Pennsylvania. However, as experts agree, school safety is not a "one-time" investment. It requires periodic review and assessment to ensure all schools have the right resources. An expert from the Sandy Hook Promise noted the following:

> When it comes to school security and safety planning, not all schools have the same experience. Some schools have strong resources to help create a school safety plan. Others do not have these same resources. As a result, there's an uneven playing field. But violence can happen in any school across the country. That's why all schools should have access to effective planning and support.[170]

From our review of the programs established by Act 44, supporting data analysis, and interviews with experts, an easily apparent conclusion is that school safety is an evolution. For example, just as students used to practice "duck and cover" in the event of a nuclear attack, today's students can relate to active shooter training and other school safety drills. To this point, Act 44 began the evolution of a larger emphasis on how to "move the needle" on school safety initiatives—and while the initiatives are a success—there are areas where we see further evolution.

Senate Resolution 178 asked us to develop recommendations based on our review of the initiatives created by Act 44 of 2018. This task was challenging because there is no easy solution to school safety. Moreover, the issues confronting Pennsylvania's schools are complex, multi-faceted, and change from year to year. Nevertheless, in the following issue areas, we present options and recommendations that we believe to be sensible, fair, and reasonable. Importantly, our recommendations are not a panacea for every potential issue facing Pennsylvania's schools, but we believe these areas have value in being pursued by the SSSC and other policymakers. Our recommendations are based on our research, coupled

Fast Facts...

❖ *Experts agree that school safety is an evolutionary process, and there is no simple panacea for ensuring school safety.*

❖ *Pennsylvania has a wealth of data on school safety, but the data is not consolidated or analyzed across data points. Removing "data silos" has the potential to provide further insights into students and school safety issues.*

❖ *We also present other recommendations such as engaging students through a youth council; seven recommendations specific to the school assessment process; a recommendation to further develop the "school coordinator" position; and discuss the significance of silent panic alarms, which several peer states require.*

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[170] Rodriguez, Katia, Sandy Hook Promise Action Fund, *see* https://www.sandyhookpromise.org/blog/advocacy/how-legislation-can-improve-school-safety-plans/, accessed January 10, 2025.

with insight and input from policy experts in school safety. Some recommendations require statutory changes, while others could be implemented with existing regulatory frameworks.

Issue Areas

A. Consolidate School Safety Data

SR 178 directed us to conduct "an analysis of other relevant data on school safety and student mental health." To that objective, we have reviewed numerous data sources highlighting Act 44's impact on school climate issues. However, as we have demonstrated, school safety data are currently siloed—that is, each data source is collected for one specific purpose and not compared to other data. For example, incident and S2SS data are collected and handled via PDE and OAG, respectively, while PCCD oversees data on school safety and security grants and the Pennsylvania Youth Survey (PAYS).[171] The lack of interconnection between these data sources limited our ability to comprehensively examine Act 44's effectiveness on overall school safety in Pennsylvania. Yet, when viewed collectively, these disparate data sources can yield a wealth of information about school climate and trends related to school safety.

To address this challenge, **we recommend that the SSSC develop an annual report on school safety and security using the consolidation of all school safety and security data, including grant data. In addition, we recommend that SSSC consider establishing a set of performance metric criteria encompassing multiple information points related to school safety.**

Comparing multiple data sources in unison can provide a more holistic picture of the current school safety and security needs in the state. For example, a publication from WestEd's Center for Standards, Assessment, and Accountability writes the following in the context of evaluating learning outcomes across different schools and districts:[172]

> While a single data source can provide a specific perspective on an issue or challenge, using multiple, diverse sources of data can provide a more robust picture of learning. [...] By using a structured data analysis process in a collaborative group, educators can harness multiple

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[171] The Pennsylvania Youth Survey is a survey on school climate that is administered to students across the state in the fall of every odd year.
[172] Arnold, Jessica, and Webb, Julie, *7 Recommendations for Using Education Data To Support Equitable Learning Outcomes*, WestEd, March 2024.

perspectives and ideas and can develop and implement responses more systematically to better support improved learning outcomes.

We found that there are other states that produce an annual school safety report using various data sources. For example, the Maryland Center for School Safety produces annual school safety reports (pursuant to the state code) that compile different grants administered in a given year, insights into different state school safety programs/resources (e.g., school safety reporting tipline), and community engagement efforts, among others.[173] Tennessee also produces similar annual reports using different data sources. Pursuant to the state law, the state Department of Education and Department of Safety and Homeland Security previously produced school safety reports that aggregated different data points relating to school safety grant programs, school resource officers, and school safety index.[174] These examples from other states provide some of the possible practices relating to school safety data that could be implemented in Pennsylvania.

As an example of how different school safety data can be used to understand overall school climate conditions in Pennsylvania, we performed a comparative analysis of data relating to suicide. We chose suicides because, in addition to being a high-priority, well-documented issue, suicide is a devasting outcome that touches on aspects of both behavioral health and physical safety/security (e.g., bullying) within schools. We focused on comparing grant uses[175] to the number of suicide incidents (from PDE's incident data), along with the percentage of respondents indicating experiences of suicidal ideation (from PAYS data). Exhibit 46 illustrates percentage changes in the suicide data since the enactment of Act 44.

[173] *See* Maryland Center for School Safety, *2023 Annual Report*.
[174] *See* Tennessee Department of Education, *Tennessee Safe Schools Report*, February 2024.
[175] Based on eligible behavioral health-related activities under Section 1306-B(j) of the Public School Code of 1949.

Exhibit 46

Percentage Changes in Grant Uses, Suicide Incidents, and Responses to PAYS Question F4b*
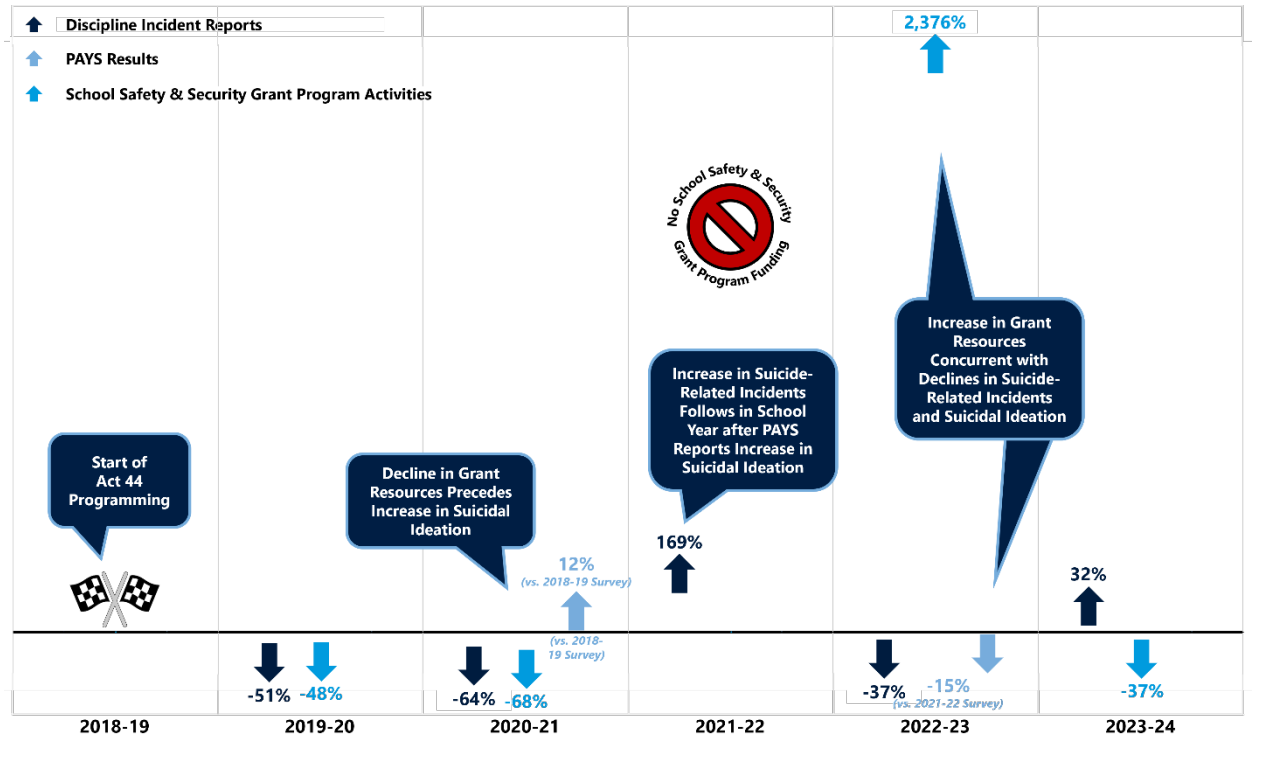
Note:
*/ "School Safety & Security Grant Program Activities" in the legends refer to the number of grant uses toward eligible behavioral health-oriented activities and services listed under Act 55 of 2022. The percentage change presented under 2022-23 for "School Safety & Security Grant Program Activities" compares 2022-23 figures to 2020-21 figures. "PAYS Results" in the legends refer to the percentage of respondents who answered "Yes" to question f4b on PAYS. The percentage change shown under 2020-21 for "PAYS Results" compares the 2021 PAYS data to the 2019 PAYS data, while the number shown under 2022-23 compares the 2023 PAYS data to the 2021 PAYS data. Question f4b on PAYS reads, "Did you ever seriously consider attempting suicide?"
Source: Developed by LBFC staff with information from PDE and PCCD.

We found a trend in our analysis that the number of students indicating suicide ideation in PAYS declined when there was an increase in behavioral health grant uses, especially following the COVID-19 pandemic. In 2022-23, grants for behavioral health activities/services increased by 2,376 percent, while the percentage of students indicating suicide ideation and the number of suicide incidents declined by 15 percent and 37 percent, respectively. In contrast, in 2023-24, behavioral health grant uses declined by 37 percent, while the number of suicide incidents increased by 32 percent.

While we caution against overinterpreting our analysis as it specifically relates to suicide incidents within schools, we believe this type of work can be used as an example of how school safety data can communicate the overall success of Act 44 initiatives and the grant program. We also caution against overinterpretation of our analysis due to some of our data limitations.

Finally, in a related matter regarding consolidation, we acknowledge the success of moving many of the administrative "school safety-related" activities from PDE to PCCD. Transferring these responsibilities to PCCD allows greater focus on the issue and allows PCCD to use its expertise in grant processing. We also acknowledge PCCD"s effort to expand the administrative capacity within PCCD by creating a senior-level "Deputy Director for School Safety" position within its Office for Research, Evaluation, and Strategic Policy Development. Along these lines, **we recommend that PCCD further expand school safety organizationally and create an "Office for School Safety."** This office could consolidate related duties like the (Philadelphia) Office for Safe School Advocate and ensure a clear administrative contact point for other agencies such as the PSP, OAG, and PDE.

B. Establish a Youth/Student Advisory Board within the SSSC

We observed an emerging trend in other states: student involvement in school safety initiatives and planning. To this point, we believe this is an area that the existing structure of the SSSC lacks, but one that would provide valuable insight into the SSSC.

We discussed this idea with PCCD staff, who saw value in the recommendation but provided some caveats from their experience. Specifically, staff noted:

> Historically, PCCD has been supportive of the concept of youth advisory boards or councils; in fact, our JJDPC set up a similar type of Youth Advisory Board to help inform the work of their committee. The main challenge that they have experienced, however, is in the recruitment and retention of the youth to participate on the board councils. The SSSC and its workgroups are extremely diverse in terms of vocation and connection to school safety with several members being in direct service/student engagement roles. If a youth advisory board was formed to directly inform the SSSC's work, we would want to ensure there are substantive issues for them to consider and for them to have opportunity to be

a part of the decision-making. We aren't confident that those types of opportunities currently exist, although that may change as this work evolves.

We acknowledge the challenges in ensuring student contributions, especially since students typically "age out" by graduating from high school. However, continuing with the theme of evolving trends in school safety, we believe that increasing student participation in the Student Safety and Security Committee (SSSC) is the next logical step.

A prime example of this involvement can be observed in Ohio's Student Safety Advisory Council, which operates under the Ohio School Safety Center. This council consists of four student representatives from Ohio's four school safety zones. According to the Ohio School Safety Center, these student representatives will identify safety concerns from their peers and create local subcommittees to develop innovative solutions to address those issues. Student participants present their findings to the Governor's School Safety Working Group.[176]

Additionally, a significant aspect of Ohio's Student Safety Advisory Council is to provide a social media presence via a web page "dedicated to helping students find the resources and information that they may need related to their own safety." From this location, videos are available as well as other social media platforms – a key aspect when messaging with youth. Further, the Student Council and its members are tasked with the following:

> Student representatives will also conduct surveys of their peers, find ways to get students more engaged with safety in their schools and communities and will be an advocate for school and community safety. Students will also work directly with the regional school safety liaisons from the OSSC to organize events, focus groups, and trainings in their regions to help highlight student success and safety best practices at various schools.[177]

The Mayland Center for School Safety (MCSS) is another example of how best to involve students in school safety. In fact, it publishes an informational guide with step-by-step instructions to promote the defined student mission of "to promote school safety awareness, kindness, and inclusion year-round through a student-led organization."[178] A key initiative of the "student advocates for school safety" is promoting the Safe Schools Maryland Reporting System, which is similar to Pennsylvania's S2SS program.

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[176] *See* https://ohioschoolsafetycenter.ohio.gov/pre-k-12-schools/student-resources, accessed January 10, 2025.
[177] *Ibid*
[178] *See* https://schoolsafety.maryland.gov/Documents/school safety, accessed January 14, 2025.

We believe the Ohio and Maryland models are excellent starting points for expanding student involvement within the SSSC. Furthermore, a Pennsylvania youth student advisory body can provide a "student contextualization" for other important initiatives created by Act 44, like S2SS.

C. Improvements to the School Safety Assessment Process

According to the Federal Commission on School Safety, "one of the biggest concerns raised by schools and school districts...has been their inability to easily sift through the multitude of security options, equipment, technologies, etc. that are available to school districts and their schools."[179] However, we also recognize that there is no "one size fits all" regarding school safety, which underscores the significance of having competent school safety assessments completed and reviewed because no one solution or recommendation can solve all problems.

The SSSC has taken a significant step by adopting baseline criteria standards. Through this approach, minimum thresholds are in place. Moreover, providing grant funding for school safety assessments and a registry of qualified vendors to perform assessments are positive actions. Nevertheless, the PSP RVAT teams continue to have a backlog and all schools should have periodic reviews to ensure they meet established school safety criteria. According to assessments specifically, we recommend the following:

1. The PSP should increase the number of troopers assigned to the RVAT unit and/or consider exploring using civilian, non-enlisted members to complete RVAT assessments under the PSP's command [See Section IV – pg. 81].

2. The SSSC should prioritize the periodic review of its school safety and security assessment criteria to bring the materials in line with the statutory requirements of the Public School Code [See Section IV – pg. 85].

3. The General Assembly consider amending Section 1305-B of the Public School Code to require school entities to submit copies of their pre-existing assessments to PCCD with any future iterations of the preparedness survey [See Section IV- pg. 87].

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[179] The Federal Commission on School Safety including the United States Department of Education, United States Department of Justice, United States Department of Health and Human Services, United States Department of Homeland Security. *Final Report* published December 2018, see pg. 126.

4. We recommend that the General Assembly consider amending Section 1304-B of the Public School Code to require the SSSC to review the School Safety and Security Provider Registry at least every three years and make updates as needed [See Section IV – pg. 92].

5. The SSSC should require providers to report the number of assessments completed by type (physical assessments, student assistance, behavioral health, and school climate assessments) annually. [See Section IV – pg. 92].

6. PCCD should integrate information about the number of assessments completed by providers into the registry so that school entities can better identify those more experienced professionals [See Section IV – pg. 92].

D. Certification for the School Safety and Security Coordinator Position

As we discussed in Section V, Issue Area B (see pg. 116), Act 44 created a new requirement for school entities to have an administrator assigned as a school safety and security coordinator (coordinator or school safety coordinator). In that discussion, we highlighted mandatory training requirements; however, the position does not require credentialing or advanced certification despite the significant responsibility of overseeing school safety training and identifying strategies for improvement within the respective entity.[180]

Stakeholders we interviewed consistently viewed this lack of certification and/or advanced training as an opportunity for improvement. This condition was especially noted as a concern for larger districts, where the position may require a complex understanding of emergency preparedness. Further, according to an end-of-year survey of coordinators, emergency preparedness was "the most popular option for additional in-depth training (50 percent requesting this training) followed by emergency procedures and drills (43 percent) and physical assessments (42 percent).[181] We agree with this assessment and believe it is an area where advanced certification should be explored for coordinators.

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[180] The SSSC approved a mandatory seven-hour in-person training class for coordinators. The class was launched in February 2024 and has reportedly reached 733 coordinators through 28 training sessions. RSM, *School Safety and Security Training and Technical Assistance Project – End of Year Survey Analysis*, SY 2023-2024. Pg 3.
[181] RSM, *School Safety and Security Training and Technical Assistance Project – End of Year Survey Analysis*, SY 2023-2024. Pg 20.

We next sought examples in other states as potential best practices for Pennsylvania to model. From our review, four states are potential examples: Maryland, New Jersey, Indiana, and Florida. Exhibit 47 that follows highlights these distinctions:

Exhibit 47

Other State Examples of the School Safety and Security Coordinator/Specialist Position

State	Notable Features
Florida	• School safety specialists must earn a certificate of completion of the school safety specialist training provided by the Florida Department of Education's Office of Safe Schools within one year after appointment and annually thereafter. • School safety specialists must earn certification as a youth mental awareness and assistance trainer. • School safety specialists must complete required FEMA Independent Study courses (and maintain certificates of completion) within 30 days of appointment.
Indiana	• The Indiana Department of Education operates the state's School Safety Specialist Academy. • An individual must fulfill the basic training (provided by the School Safety Specialist Academy) requirements to become fully certified as a school safety specialist and participate each subsequent year in two days of school safety training (advanced training) to remain certified as a school safety specialist. • The Indiana Code also directs the state Department of Education to assemble an advisory group of school safety specialists from around the state to make recommendations concerning the curriculum and standards for school safety specialist training.
Maryland	• The Code of Maryland Regulations directs the Maryland Center for School Safety to certify a school safety coordinator upon completion of its curriculum and required FEMA courses. • School safety coordinators are required to complete an additional four hours of supplemental instruction annually in content areas approved by the Center to maintain certification.
New Jersey	• The New Jersey Department of Education operates the state's School Safety Specialist Academy. • To obtain school safety specialist credentials, one must undergo the four-day School Safety Specialist certification training through the School Safety Specialist Academy and complete the required FEMA courses.

Note: Some states use the term "specialist" (e.g., Florida) rather than "coordinator" (e.g., Pennsylvania).
Source: Developed by LBFC staff from the Florida Department of Education, Florida Administrative Code, Florida Statutes, Indiana Department of Education, Indiana Code, Maryland Center for School Safety, Code of Maryland Regulations, New Jersey Department of Education, and New Jersey Statutes Annotated.

## E. "Alyssa's Law" School Safety Legislation

On February 14, 2018, a school shooting at the Marjory Stoneman Douglas High School, killed fourteen students and three teachers. One of the students killed was Alyssa Alhadeff. Following her death, Alyssa's parents created a non-profit organization (Make Our Schools Safe.org) dedicated to protecting students and teachers at school. Make Our Schools Safe.org developed legislation, Alyssa's Law, requiring the installation of silent panic alarms directly linked to law enforcement.

As an example of the effectiveness of these silent alarm/panic systems, on September 4, 2024, a shooting took place at Apalachee High School in Georgia. The Georgia Bureau of Investigation is crediting the silent panic alarm system installed in the school over the summer for saving lives during that event.

As shown in Exhibit 48, Alyssa's Law has been passed in seven states and introduced in nine others and the federal government.

Exhibit 48

Alyssa's Law in Other States
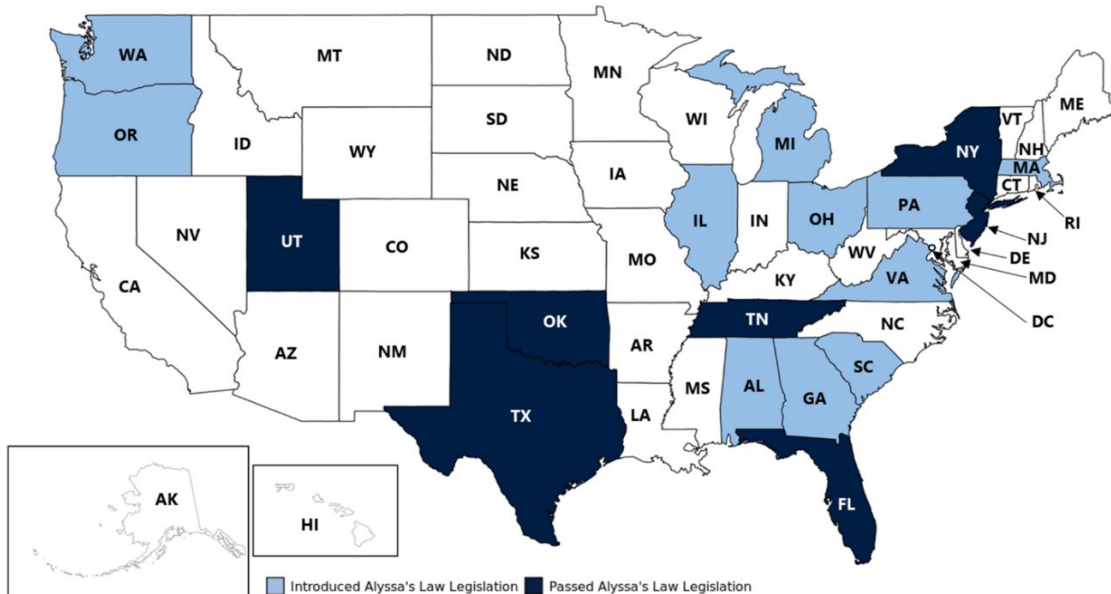
Note: Arizona (2021 & 2022) and Nebraska (2020) introduced legislation in previous years. Oregon has the Wireless Panic Alarm Grant, open to school districts to install wireless panic alert systems by June 30,

2025. In Pennsylvania, co-sponsor memos to reintroduce Alyssa's Law legislation in the 2025-26 legislative session have been circulated.

Source: Developed by LBFC staff from makeourschoolsafe.org and review of other state legislation.

As for applicability in Pennsylvania, "Alyssa Law" legislation was introduced in the previous legislative session but did not advance in either chamber. The bill is expected to be introduced again in the current legislative session.

Conceivably, there are alternatives to a legislative remedy. For example, panic button technology is an eligible expense under category 12 of Section 1306-B(J) of the PSC, and schools could seek funding for these systems. We checked with PCCD staff, who noted that panic buttons are not currently considered a Level 1, or basic, baseline criteria item or activity. Thus, school entities would need to ensure those items are fulfilled before pursuing panic button systems.   We inquired about the possibility of the SSSC making panic button systems a higher priority, and staff noted the following:

> ...It is possible that the [SSSC] Committee may consider moving panic buttons to a Level 1 basic status. I would note, however, that most Level 1 basic items or activities are based on statutory mandates that schools must already meet according to the law.

The implementation cost for this system is also a significant consideration, but we could not define a specific cost estimate. We found that in Florida, the implementation cost at each school was $2,000-$8,000 per year. In Ohio, which recently introduced "Alyssa Law" legislation, the costs were estimated to be approximately $15,000 per building, with annual maintenance costs. In Georgia, the system cost was approximately $8,000 per school per year. As we reported in Section III, Texas allocated $17.1 million for its Silent Alert Technology Grant program, which was used to provide direct grants to LEAs to purchase silent panic alert technologies. As a result, the cost for statewide implementation would be high for a state like Pennsylvania, which has a decentralized education system with many school buildings. Consequently, while we recommend that the General Assembly pass a requirement for panic button notification systems, we also recommend that it be done in a phased approach and with funding assistance. Further research is required to define the specific estimated costs.

APPENDICES

Appendix A – Senate Resolution 178

THE GENERAL ASSEMBLY OF PENNSYLVANIA

SENATE RESOLUTION

No.   178   Session of 2023

INTRODUCED BY MARTIN, BROWN, DUSH AND SCHWANK, OCTOBER 3, 2023

SENATOR ARGALL, EDUCATION, AS AMENDED, NOVEMBER 14, 2023

A RESOLUTION
  Directing the Legislative Budget and Finance Committee to
conduct a study evaluating the outcomes of Act 44 of 2018 and to
     issue a report of its findings and recommendations.
    WHEREAS, Act 44 of 2018 established the School Safety and
Security Grant Program and the Safe2Say Program and formed the
School Safety and Security Committee in the Pennsylvania
Commission on Crime and Delinquency; and
    WHEREAS, Act 44 of 2018 undoubtedly had much success in
better protecting the lives of our children, teachers and school
visitors throughout this Commonwealth and providing schools with
the resources they need; and
    WHEREAS, The intent of this resolution is to improve upon the
successes of Act 44 of 2018 and help support potential future
policy recommendations for the programs and services established
under Act 44 of 2018; therefore be it
    RESOLVED, That the Senate direct the Legislative Budget and
Finance Committee to conduct a study evaluating the outcomes of
Act 44 of 2018 and include all of the following information,
using the most recent data available, regarding the program:

(1)   The ~~average dollar amount that school entities~~ AMOUNT THAT EACH SCHOOL ENTITY received through the program ~~with intent to provide safety and security services~~.

(2)   An analysis of other relevant data sources on school safety and student mental health, including Statewide and county data from the Pennsylvania Youth Survey, as well as data on school discipline.

(3)   Using aggregate data, an analysis of types of programs and services that schools applied for using their grant money, aligned with items and activities included in section 1306-B(j) of the Public School Code of 1949.

(4)   ~~An assessment~~ A COMPARISON of the baseline criteria adopted by the School Safety and Security Committee ~~for physical secu-rity and behavioral health.~~ WITH NATIONAL STANDARDS.

(5)   A review of the standards required for school ~~resource of-ficers and school police officers~~ SECURITY PERSONNEL in Article XIII-C of the Public School Code of 1949, including a comparison to national standards.

(6)   A compilation of the NUMBER OF ASSESSMENTS CONDUCTED BY THE Risk and Vulnerability Assessment Teams and the third-party vendors ~~of the number of assessments conducted~~ under 1307-B of the Public School Code of 1949 over the last five years.

(7)   A review of the registration data and qualifications of school safety and security assessment providers in section 1304-B of the Public School Code of 1949 and compare to national standards.

(8)   A review of the safety and security best practices of other states;

and be it further

   RESOLVED, That the Legislative Budget and Finance Committee ~~work with~~ GATHER INPUT FROM THE SCHOOL SAFETY AND SECURITY COMMITTEE AND COORDINATE WITH the Pennsylvania Commission on Crime and Delinquency to conduct the study; ~~and to gather input from all of the following:~~

~~(1)   The Office of Attorney General.~~

~~(2)   The Pennsylvania Emergency Management Agency.~~

(3)   The Pennsylvania State Police.

(4)   The Pennsylvania Association of School Business officials.

(5)   The Pennsylvania Association of School Administrators.

(6)   The State Fraternal Order of Police.

(7)   The Pennsylvania Psychological Association.

(8)   The Pennsylvania Society for Clinical Social Work.

(9)   The American Institute of Architects of Pennsylvania.

(10)   The Pennsylvania Principals Association.

(11)   The Pennsylvania State Education Association.

(12)   The Pennsylvania School Boards Association;

and be it further

RESOLVED, That the Legislative Budget and Finance Committee report its findings and recommendations to the Appropriations Committee of the Senate, the Appropriations Committee of the House of Representatives, the Education Committee of the Senate and the Education Committee of the House of Representatives no later than November 30, 2024.

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Appendix B – SSSC Physical/Policy/Training Assessment Criteria Workgroup

Name	Position Title	Agency	County
Mr. Scott Bohn	President	PA Chiefs of Police Association	Chester
Ms. Randall Buffington	Director of Operations	Southern York County School District	York
Mr. Michael Deery	Chief Counsel	Senator Vincent Hughes	Dauphin
PFC Julio Ferrufino	School Resource Officer	Susquehanna Township Police Department	Dauphin
Mr. Randall Fox	Safe Schools Director	Center for Schools and Communities	Cumberland
Ms. Nancy Gierl	High School Counselor	Elizabeth Forward School District	Allegheny
Dr. Jill Hackman	Executive Director	Berks County Intermediate Unit	Berks
Mr. David Hein	Board Vice President	Parkland School District	Lehigh
Mr. Mike Hurley		PA Assn. of School Business Officials (PASBO)	Cumberland
Ms. Julie Kane	Assistant Policy Director	PA Department of Education	Dauphin
Mr. Mike Kelly	Architect	KCBA Architects	Montgomery
Mr. Brian Krause	Chief Security Officer	Vulnerability Solutions Group, LLC	Dauphin
Dr. Mark Kudlawiec	Superintendent	Chestnut Ridge School District	Bedford
Mr. Scott Kuren	Director, Office for Safe Schools	PA Department of Education	Dauphin
Dr. Peter Langman	Psychologist		Lehigh
Mr. Anthony Naradko	Director of District Safety and Security	Parkland School District	Lehigh

Trooper Matthew Pavone	Risk and Vulnerability Assessment Team (RVAT)	PA State Police	Dauphin
Sgt. Jason Reber	President, FOP Lodge #78	Susquehanna Township Police Department	Dauphin
Mr. Jonathan Ross	Principal	Lionville Middle School	Chester
Mr. Timothy Roth	External Affairs Office	PA Emergency Management Agency (PEMA)	Dauphin
Mr. Aaron T. Skrbin	High School Principal; Director of School Safety	South Fayette Township School District	Allegheny
Mr. Charlie Thiel	President, School Board	School District of the City of Allentown	Lehigh
Ms. Vicki Wilken	Legislative Counsel	Senator Patrick Browne	Dauphin

Appendix C – SSSC Behavioral Health and School Climate Assessment Criteria Workgroup

Name	Position Title	Agency	County
Mr. Jonathan Bauer	Principal	Upper Merion School District	Montgomery
Mr. Kevin Bethel	Fellow	Stoneleigh Foundation	Philadelphia
Ms. Susan Billy	Manager of Behavioral Health Support Services	Lancaster-Lebanon I.U. #13	Lancaster
Mr. Edwin Bowser	Superintendent	Forest Hills School District	Cambria
Ms. Lauren Wenner Bricker	Clinical Social Worker	Harrisburg School District	Dauphin
Ms. Nikki Bricker	Licensed Clinical Social Worker		Dauphin
Mr. Stephen Bruder	Policy Director	Senator Jay Costa	Dauphin
Dr. Danielle Budash	School Psychologist	Milton Hershey School	Dauphin
Honorable Donna Bullock	Representative	PA House of Representatives	Philadelphia
Ms. Gwenn Dando	Chief of Staff	Senator Wayne Langerholc, Jr.	Dauphin
Dr. Susan Edgar-Smith	Dean and Professor	College of Education, Eastern University	Delaware
Dr. Terri Erbacher	School Psychologist; Clinical Associate Professor	Delaware County Intermediate Unit; Philadelphia College of Osteopathic Medicine	Delaware
Ms. Carolyn Freeman	Elementary School Teacher	Canon-Mac School District	Washington
Mr. Harold Jordon	Senior Policy Advocate	ACLU of Pennsylvania	Philadelphia
Ms. Julie Kane	Assistant Policy Director	PA Department of Education	Dauphin
Ms. Cheryl Kleiman	Policy Attorney	Education Law Center	Allegheny
Mr. Scott Kuren	Director, Office for Safe Schools	PA Department of Education	Dauphin

Dr. David Lillenstein	Board President	Association of School Psychologists of PA	Dauphin
Ms. Barb Magnotta	School Nurse	Central Valley School District	Beaver
Dr. Mark McGowan	Professor and Licensed Psychologist	Department of Education and School Psychology, Indiana University of PA	Indiana
Dr. Stacie Molnar-Main	Safe Schools Office	PA Department of Education	Dauphin
Dr. Jason Pederson	School Psychologist	Derry Township School District	Dauphin
Ms. Rosary Pennington	Head Coach	Clarion Area School District	Clarion
Dr. Perri Rosen	Project Director, Children's Bureau	PA Department of Human Services, Office of Mental Health and Substance Abuse Services	Dauphin
Mr. Jim Sharp	Director, Children's Division	RCPA	Dauphin
Dr. Shirley Woika	Associate Professor, Instructor in School Psychology	Pennsylvania State University	Centre
Dr. John Zesiger	Superintendent	Moshannon Valley School District	Clearfield

Appendix D – Intermediate Units

Intermediate Unit & Counties	Schools Represented
Intermediate Unit 1: (IU 1) 1 Intermediate Unit Drive Coal Center, PA 15423 **Counties: Fayette, Greene, Washington**	Career and Technical: Connellsville Area Career and Technical Center, Fayette County Career and Technical Institute, Greene County Career and Technology Center, Mon Valley Career and Technology Center, Western Area Career and Technology Center Member School Districts: Albert Gallatin Area, Avella Area, Bentworth, Bethlehem-Center, Brownsville Area, Burgettstown Area, California Area, Canon-McMillan, Carmichaels Area, Central Greene, Charleroi Area, Chartiers-Houston, Connellsville Area, Fort Cherry, Frazier, Jefferson-Morgan, Laurel Highlands, McGuffey, Peters Township, Ringgold, Southeastern Greene, Trinity Area, Uniontown Area, Washington, West Greene Other: Nonpublic Schools
Pittsburgh Mt. Oliver (IU 2) 1305 Muriel Street Pittsburgh, PA 15203 **Counties: Allegheny (Pittsburgh)**	Career and Technical: None listed Member School Districts: Pittsburgh Public Schools Other: Diocese of Pittsburgh Schools, Private Schools, Charter Schools, Neglected Institutions, Delinquent Institutions
Allegheny (IU 3) 475 East Waterfront Drive Homestead, PA 15120 **Counties: Allegheny**	Career and Technical: None listed Member School Districts: Allegheny Valley, Avonworth, Baldwin-Whitehall, Bethel Park, Brentwood Borough, Carlynton, Chartiers Valley, Clairton City, Cornell, Deer Lakes, Duquesne City, East Allegheny, Elizabeth Forward, Fox Chapel Area, Gateway, Hampton Township, Highlands, Keystone Oaks, McKeesport Area, Montour, Moon Area, Mt. Lebanon, North Allegheny, North Hills, Northgate, Penn Hills, Pine-Richland, Plum Borough, Quaker Valley, Riverview, Shaler Area, South Allegheny, South Fayette Township, South Park, Steel Valley, Sto-Rox, Upper St. Clair, West Allegheny, West Jefferson Hills, West Mifflin Area, Wilkinsburg Borough, Woodland Hills
Midwestern (IU 4) 453 Maple Street Grove City, PA 16127 **Counties: Butler, Lawrence, Mercer**	Career and Technical: Butler County Career and Technical Center, Lawrence County Career and Technical Center, Mercer County Career and Technical Center Member School Districts: Butler Area, Commodore Perry, Ellwood City Area, Farrell Area, Greenville Area, Grove City, Hermitage Area, Jamestown Area, Karns City Area, Knoch, Lakeview, Laurel, Mars Area, Mercer Area, Mohawk Area, Moniteau, Neshannock Township, New Castle Area,

	Reynolds, Seneca Valley, Sharon City, Sharpsville Area, Shenango Area, Slippery Rock Area, Union Area, West Middlesex Area, Wilmington Area Other: Nonpublic Schools, Charter Schools
Northwest Tri-County (IU 5) 252 Waterford Street Edinboro, PA 16412 **Counties: Crawford, Erie, Warren**	Career and Technical: Crawford County Career and Technical School, Erie County Technical School Member School Districts: Conneaut, Corry Area, Crawford Central, Erie Public Schools, Fairview, Fort LeBoeuf, General McLane, Girard, Harbor Creek, Iroquois, Millcreek Township, North East, Northwestern, PENNCREST, Union City, Warren County, Wattsburg Area Other: Charter Schools
Riverview (IU 6) 270 Mayfield Road Clarion, PA 16214 **Counties: Clarion, Jefferson, Forest, Ve-** **nango *part Armstrong, Butler, Clearfield,* *Crawford, Indiana***	Career and Technical: Clarion County Career Center, Jeff Tech, Venango Technology Center Member School Districts: Allegheny-Clarion Valley, Brockway Area, Brookville Area, Clarion Area, Clarion-Limestone Area, Cranberry Area, DuBois Area, Forest Area, Franklin Area, Keystone, North Clarion County, Oil City Area, Punxsutawney Area, Redbank Valley, Titusville Area, Union, Valley Grove Other: Nonpublic Schools
Westmoreland (IU 7) 102 Equity Drive Greensburg, PA 15601 **Counties: Westmoreland**	Career and Technical: Central Westmoreland Career and Technology Center, Eastern Westmoreland Career and Technology Center, Northern Westmoreland Career and Technology Center Member School Districts: Belle Vernon Area, Burrell, Derry Area, Franklin Regional, Greater Latrobe, Greensburg Salem, Hempfield Area, Jeannette City, Kiski Area, Ligonier Valley, Monessen City, Mount Pleasant Area, New Kensington-Arnold, Norwin, Penn-Trafford, Southmoreland, Yough
Appalachia (IU 8) 4500 6th Avenue Altoona, PA 16602 **Counties: Bedford, Blair, Cambria, Somerset**	Career and Technical: Admiral Peary Area Vocational-Technical School, Bedford County Technical Center, Greater Altoona Career and Technology Center, Greater Johnstown Career and Technical Center, Somerset County Technology Center Member School Districts: Altoona Area, Bedford Area, Bellwood-Antis, Berlin-Brothersvalley, Blacklick Valley, Cambria Heights, Central Cambria, Chestnut Ridge, Claysburg-Kimmel, Conemaugh Township Area, Conemaugh Valley, Everett Area, Ferndale Area, Forest Hills, Greater Johnstown, Hollidaysburg Area, Meyersdale Area, North Star, Northern Bedford County, Northern Cambria, Penn Cambria, Portage Area, Richland, Rockwood Area, Salisbury-Elk Lick, Shade-Central City, Shanksville-Stoneycreek, Somerset Area, Spring Cove, Turkeyfoot Valley Area. Tussey Mountain, Tyrone Area, Westmont Hilltop, Williamsburg Community, Windber Area Other: Charter Schools
Seneca Highlands (IU 9)	Career and Technical: Seneca Highlands Career and Technical Center

119 S Mechanic Street Smethport, PA 16749 **Counties: Cameron, Elk, McKean, Potter**	**Member School Districts:** Austin Area, Bradford Area, Cameron County, Coudersport Area, Galeton Area, 0Johnsonburg Area, Kane Area, Northern Potter, Oswayo Valley, Otto-Eldred, Port Allegany, Ridgway Area, Smethport Area, St. Marys Area,
Central (IU 10) 200 Shady Lane Suite 100 Philipsburg, PA 16866 **Counties: Centre, Clearfield, Clinton**	**Career and Technical:** Clearfield County Career and Technology Center, Central Pennsylvania Institute of Science and Technology, Keystone Central School District Career and Technology Center **Member School Districts:** Bald Eagle Area, Bellefonte Area, Clearfield Area, Curwensville Area, Glendale, Harmony Area, Keystone Central, Moshannon Valley, Penns Valley Area, Philipsburg-Osceola Area, State College Area, West Branch Area **Other:** Charter Schools
Tuscarora (IU 11) 2527 US Highway 522 South McVeytown, PA 17051 **Counties: Fulton, Huntingdon, Juniata, Mifflin**	**Member School Districts:** Central Fulton, Forbes, Huntingdon Area, Juniata County, Juniata Valley, Mifflin County, Mount Union Area, Southern Fulton, Southern Huntingdon County **Other:** Charter Schools, Nonpublic Schools
Lincoln (IU 12) 65 Billerbeck Street New Oxford, PA 17350 **Counties: Adams, Franklin, York**	**Career and Technical:** Adams County Technical Institute, Franklin County Career and Technical Center, York County School of Technology **Member School Districts:** Bermudian Springs, Central York, Chambersburg Area, Conewago Valley, Dallastown Area, Dover Area, Eastern York, Fairfield Area, Fannett-Metal, Gettysburg Area, Greencastle-Antrim, Hanover Public, Littlestown Area, Northeastern, Red Lion Area, School District of York City, South Eastern, South Western, Southern York, Spring Grove Area, Tuscarora, Upper Adams, Waynesboro Area, West York Area, York Suburban **Other:** Nonpublic Schools
Lancaster-Lebanon (IU 13) 1020 New Holland Avenue Lancaster, PA 17601 **Counties: Lancaster, Lebanon**	**Career and Technical:** Lancaster County Career and Technology Center, Lebanon County Career and Technology Center **Member School Districts:** Annville-Cleona, Cocalico, Columbia Borough, Conestoga Valley, Cornwall-Lebanon, Donegal, Eastern Lancaster County, Eastern Lebanon County, Elizabethtown Area, Ephrata Area, Hempfield, Lampeter-Strasburg, School District of Lancaster, Lebanon, Manheim Central, Manheim Township, Northern Lebanon, Palmyra Area, Penn Manor, Pequea Valley, Solanco, Warwick **Other:** Charter Schools
Berks County (IU 14) 1111 Commons Blvd	**Career and Technical:** Berks Career and Technology Center, Reading Muhlenberg Career and Technology Center

Reading, PA 19605

Counties: Berks

Member School Districts: Antietam, Boyertown Area, Brandywine Heights Area, Conrad Weiser, Daniel Boone Area, Exeter Township, Fleetwood Area, Governor Mifflin, Hamburg Area, Kutztown Area, Muhlenberg, Oley Valley, Reading, Schuylkill Valley, Tulpehocken, Twin Valley, Wilson, Wyomissing Area
Other: Nonpublic Schools

Capital Area (IU 15)
55 Miller Street
Enola, PA 17025

Counties: Cumberland, Dauphin, Perry, Northern York

Career and Technical: Cumberland-Perry Area Tech School, Dauphin County Tech School
Member School Districts: Big Spring, Camp Hill, Carlisle Area, Central Dauphin, Cumberland Valley, Derry Township, East Pennsboro Area, Greenwood, Halifax Area, Harrisburg, Lower Dauphin, Mechanicsburg Area, Middletown Area, Millersburg Area, Newport, Northern York County, Shippensburg Area, South Middleton, Steelton-Highspire, Susquehanna Township, Susquenita, Upper Dauphin Area, West Perry, West Shore
Other: Charter Schools

Central Susquehanna (IU 16)
90 Lawton Lane
Milton, PA 17847

Counties: Columbia, Montour, Northumberland, Snyder, Union

Career and Technical: Columbia-Montour Area Vocational-Technical School, Northumberland County Career and Technology Center, SUN Area Technical Institute
Member School Districts: Benton Area, Berwick Area, Bloomsburg Area, Central Columbia, Danville Area, Lewisburg Area, Line Mountain, Midd-West, Mifflinburg Area, Millville Area, Milton Area, Mount Carmel Area, Selinsgrove Area, Shamokin Area, Shikellamy
Other: Nonpublic Schools

BLaST (IU 17)
2400 Reach Road
PO Box 3609
Williamsport, PA 17701

Counties: Bradford, Lycoming, Sullivan, Tioga

Career and Technical: Lycoming Career and Technical Center, Northern Tier Career Center
Member School Districts: Athens Area, Canton Area, East Lycoming, Jersey Shore, Loyalsock Township, Montgomery Area, Montoursville Area, Muncy Area, Northeast Bradford, Northern Tioga, Sayre Area, South Williamsport Area, Southern Tioga, Sullivan County, Towanda Area, Troy Area, Wellsboro Area, Williamsport Area, Wyalusing Area
Other: Nonpublic Schools

Luzerne (IU 18)
368 Tioga Avenue
Kingston, PA 18704

Counties: Luzerne, Wyoming

Career and Technical: West Side Career and Technical Center, Wilkes-Barre Career and Technical Center
Member School Districts: Crestwood, Dallas, Hanover Area, Hazleton Area, Lake Lehman, Nanticoke Area, Northwest Area, Pittston Area, Tunkhannock Area, Wilkes Barre Area, Wyoming Area, Wyoming Valley West
Other: Nonpublic Schools

Northeastern (IU 19)
1200 Line Street
Archbald, PA 18403

Career and Technical: The Career Technology Center of Lackawanna County, Susquehanna Career and Technology Center
Member School Districts: Abington Heights, Blue Ridge, Carbondale Area, Dunmore, Elk Lake, Forest City Regional, Lackawanna Trail, Lakeland, Mid Valley, Montrose Area, Mountain View,

Counties: Lackawanna, Pike, Susquehanna, Wayne, Wyoming	North Pocono, Old Forge, Riverside, Scranton City, Susquehanna Community, Valley View, Wallenpaupack Area, Wayne Highlands, Western Wayne Other: Nonpublic Schools, Charter Schools
Colonial (IU 20) 6 Danforth Drive Easton, PA 18045 **Counties: Monroe, Northampton, Pike**	Career and Technical: Bethlehem Area Vocational-Technical School, Career Institute of Technology, Monroe Career and Technical Institute Member School Districts: Bangor Area, Bethlehem Area, Delaware Valley, East Stroudsburg Area, Easton Area, Nazareth Area, Northampton Area, Pen Argyl Area, Pleasant Valley, Pocono Mountain, Saucon Valley, Stroudsburg Area, Wilson Area
Carbon Lehigh (IU 21) 4210 Independence Drive Schnecksville, PA 18078 **Counties: Carbon, Lehigh**	Career and Technical: Carbon Career and Technical Institute, Lehigh Career and Technical Institute Member School Districts: Allentown, Catasauqua Area, East Penn, Jim Thorpe Area, Lehighton Area, Northern Lehigh, Northwestern Lehigh, Palmerton Area, Panther Valley, Parkland, Salisbury Township, Southern Lehigh, Weatherly Area, Whitehall-Coplay Other: Charter Schools
Bucks County (IU 22) 705 N Shady Retreat Road Doylestown, PA 18901 **Counties: Bucks**	Career and Technical: Bucks County Technical High School, Middle Bucks Institute of Technology, Upper Bucks County Technical School Member School Districts: Bensalem Township, Bristol Borough, Bristol Township, Centennial, Central Bucks, Council Rock, Morrisville Borough, Neshaminy, New Hope-Solebury, Palisades, Pennridge, Pennsbury, Quakertown Community
Montgomery County (IU 23) 2 West Lafayette Street Norristown, PA 19401 **Counties: Montgomery**	Career and Technical: Central Montco Technical High School, Eastern Center for Arts and Technology, North Montco Technical Career Center, Western Montgomery Career and Technology Center Member School Districts: Abington, Bryn Athyn, Cheltenham, Colonial, Hatboro-Horsham, Lower Merion, Lower Moreland Township, Methacton, Norristown Area, North Penn, Perkiomen Valley, Pottsgrove, Pottstown, School District of Jenkintown, School District of Springfield Township, Souderton Area, Spring-Ford Area, Upper Dublin, Upper Moreland, Upper Perkiomen, Wissahickton Other: Nonpublic Schools, Charter Schools
Chester County (IU 24) 455 Boot Road Downingtown, PA 19335 **Counties: Chester**	Career and Technical: Chester County Technical College High School Brandywine Campus, Chester County Technical College High School Pennock's Bridge Campus, Chester County Technical College High School Pickering Campus Member School Districts: Avon Grove, Coatesville Area, Downingtown Area, Great Valley, Kennett Consolidated, Octorara Area, Owen J. Roberts, Oxford Area, Phoenixville Area, Tredyffrin/Easttown, Unionville-Chadds Ford, West Chester Area

Other: Nonpublic Schools, Charter Schools

Delaware County (IU 25) 200 Yale Avenue Morton, PA 19070 **Counties: Delaware**	Career and Technical: Delaware County Technical High Schools (Aston and Folcroft) Member School Districts: Chester Upland, Chichester, Garnet Valley, Haverford Township, Interboro, Marple Newtown, Penn-Delco, Radnor Township, Ridley, Rose Tree Media, Southeast Delco, Springfield, Upper Darby, Wallingford-Swarthmore, William Penn Other: Archdiocesan Schools, Private Schools, Charter Schools
Philadelphia (IU 26) 440 N Broad Street Philadelphia, PA 19130 **Counties: Philadelphia**	Member School Districts: School District of Philadelphia Other: Charter Schools, Alternative Schools, Cyber Charter Schools,
Beaver Valley (IU 27) 147 Poplar Avenue Monaca, PA 15061 **Counties: Beaver**	Career and Technical: Beaver County Career and Technology Center Member School Districts: Aliquippa, Ambridge Area, Beaver Area, Big Beaver Falls Area, Blackhawk, Central Valley, Freedom Area, Hopewell Area, Midland Borough, New Brighton Area, Riverside Beaver County, Rochester Area, South Side Area, Western Beaver County Other: Charter Schools, Nonpublic Schools, New Horizon School for students with disabilities
ARIN (IU 28) 2895 W Pike Road Indiana, PA 15701 **Counties: Armstrong, Indiana**	Career and Technical: Indiana County Technology Center, Lenape Technical School Member School Districts: Apollo-Ridge, Armstrong, Freeport Area, Homer-Center, Indiana Area, Leechburg Area, Marion Center Area, Penns Manor Area, Purchase Line, River Valley, United Other: Nonpublic Schools
Schuylkill (IU 29) 17 Maple Avenue PO Box 130 Mar Lin, PA 17951 **Counties: Schuylkill**	Career and Technical: Schuylkill Technology Center Member School Districts: Blue Mountain, Mahanoy Area, Minersville Area, North Schuylkill, Pine Grove Area, Pottsville Area, St. Clair Area, Schuylkill Haven Area, Shenandoah Valley, Tamaqua Area, Tri-Valley, Williams Valley Other: Charter Schools, Diocese of Allentown Schools, Private Elementary Schools

Appendix E – PCCD's Response to the Draft Report

Pennsylvania
**Commission on Crime
and Delinquency**

March 5, 2025

Mr. Christopher Latta
Executive Director
Pennsylvania Legislative Budget & Finance Committee (LBFC)
613 North Street
Harrisburg, PA 17105

Dear Director Latta,

Thank you for the opportunity to participate in the LBFC's "*A Study Pursuant to SR 178: School Safety Initiatives*." It was a pleasure interacting with your staff throughout this endeavor and quite gratifying to see so much of our important work in the school safety space memorialized by the Committee.

We appreciate the recommendations that you have developed and will be sharing them with the School Safety and Security Committee (SSSC) for their consideration. We would note that we are already in the process of implementing one of your recommendations, which is to update the assessment criteria. Over the past six weeks, we have reconvened workgroups to update both the physical security and behavioral health assessment criteria to bring them into alignment with the 2023 revised baseline criteria standards as well as updated state and federal laws. We intend to bring these revisions before the SSSC at its next meeting on March 19, 2025. Following approval of the updated assessment criteria, PCCD staff also intend to review the criteria for approving assessors and conduct a review of, and outreach to, currently approved assessors.

In addition, the SSSC is in the process of developing the 2025 version of its School Safety and Security Preparedness Survey, which measures trends and outcomes in school safety among Pennsylvania schools. While we understand the recommendation to add a layer of validity to the survey by collecting actual assessments from schools as part of the survey, we are ever mindful of the detailed vulnerabilities often expressed in such assessments and are extremely cautious about the potential risk for accidental disclosure or data breach. Our preference has been, and remains, to require school entities to only provide copies of a signature of completion page or attestation of completion by a chief school administrator to ensure validity without creating a greater risk of security breach.

Many of the additional recommendations that you have provided are certainly within our domain (e.g., performance metrics, annual report, etc.), and we will explore those suggestions as well. Again, thank you so much for your thoughtful review of our school safety program.

Sincerely,

Michael Pennington
Executive Director, PCCD

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