A Review Of The Safe Schools Program

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Project Staff

David Wickersham, Director
Bart Liguori, PhD, Research Manager
Sabrina J. Olds
Logan Rupard
Albert Alexander
Brenda Landy
Deborah Nelson, PhD

Foreword

For more than 25 years, the Office of Education Accountability (OEA) has played an important role in reporting on education reform in the Commonwealth of Kentucky. Today, the 16 employees of OEA strive to provide fair and equitable accountability, documenting the challenges and opportunities confronting Kentucky's education system.

In December 2015, the Education Assessment and Accountability Review Subcommittee approved the OEA 2016 study agenda, which included the report you are reading now. This study discusses school safety trends in Kentucky over the last couple of years. This report also discusses the roles and responsibilities of state agencies, districts, and schools when dealing with school safety. A financial analysis is also included.

The Legislative Research Commission comprises more than 400 professionals who work to make the legislative process accessible, informative, and relevant to the citizens of the commonwealth. OEA is an important part of that mission. Thank you for your interest in this report and for your interest in school safety in Kentucky.

David A. Byerman
Director

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Background

On December 1, 2015, the Education Assessment and Accountability Review Subcommittee approved the Office of Education Accountability (OEA) 2015 study agenda, which included issues related to school safety.

The primary purpose of this study is to examine how well local and state officials are carrying out their statutory duties related to school safety. This study examines coordinated services, the adoption of assessments, codes, safety and emergency plans, as well as notification, reporting, and tracking of student offenses past and present.

Staff analyzed published and unpublished student, personnel, and finance data from the US Department of Education, the Kentucky Department of Education (KDE), and the Kentucky Center for School Safety (KCSS). In addition, staff interviewed KDE and KCSS personnel and discussed selected issues with educators during site visits to seven district offices and 11 schools.

Major Conclusions And Recommendations

Strengths

Overall, Kentucky has many strengths with respect to school safety.

School Environment. In an overwhelming majority of Kentucky schools, almost all teachers perceive their work environments as safe. Kentucky mirrors the nation with respect to teacher-reported and student-reported safety issues, with the exception that significantly fewer Kentucky students reported using marijuana.

School And District Actions. Among the 11 schools visited for this study, all have complete and up-to-date documentation indicating that drills are completed according to statute. All schools have up-to-date asbestos plans and transportation inspections. School volunteers have state background checks and are given orientation materials before being allowed to work with students. Districts ensure that staff receive annual training on required topics.

Support For Districts And Schools. Administrators reported that they value the resources, best practices information, training, school safety assessments, and other services offered by KCSS.

Structural Issues

As for challenges, a number of issues relate to the structural environment in which multiple agencies work together to follow statutes that relate to school safety.

Roles And Responsibilities. Statutes sometimes assign overlapping roles, while leaving other roles not clearly assigned to any organization. For example, both KCSS and KDE have duties to report information, provide guidance and training, and collect some types of compliance data.

KRS 158.445 codifies what is required in local school safety assessments. KRS 158.444(2)(b)4 also requires KDE to establish and maintain the statewide data collection system.
KRS 158.444(2)(b)4 also requires that the data collection system include data from the local safety assessments required in KRS 158.445; however, it is unclear whether the school safety assessments described in KRS 158.445 were required only during the 1998-1999 school year.

Recommendation 4.4
The General Assembly may consider revising KRS 158.442 through KRS 158.449 along with KRS 158.148, to avoid confusion and clarify the roles and responsibilities assigned to KDE, KCSS, districts, and schools.

Safety issues outside school control will require more interagency cooperation. Administrators are seeing a substantial increase in mental health and extreme behavioral issues, even with some of the youngest students. Schools may lack qualified personnel and legal authority to deal with some of these issues.

Compliance Monitoring And Enforcement. Statutes do not explicitly spell out responsibilities for enforcing district and school compliance with statutes. Although districts can voluntarily ask KCSS for a safety assessment, no organization has the responsibility to follow up to make sure that deficiencies are corrected, and no organization conducts compliance audits on a nonvoluntary basis.

It may be argued that, as the organizations with regulatory authority over Kentucky's K-12 education system, the Kentucky Board of Education and KDE have the primary responsibility to ensure compliance. However, they currently exercise a limited role. The state's main monitoring tool is a set of self-reported assurances by district superintendents that schools in their districts are compliant. However, district superintendents do not have specialized safety knowledge and are not in each school on a daily basis. KCSS' school safety assessments and OEA's site visits found much lower levels of compliance than superintendents reported.

Recommendation 4.3
KDE should consider adding safety compliance measures to the Statewide Consolidated Monitoring Process.

Student Discipline. Efforts to maintain student discipline face a number of hurdles. District and school administrators have concerns about the implementation of SB 200 (2014). The intended consequence of SB 200 (2014) is to reduce youth incarceration rates; however, districts are struggling to ensure that students and their parents understand that there are consequences for violating rules and that students must correct misbehavior. Administrators are also seeing a substantial increase in mental health and extreme behavioral issues with students. These issues are seen even with younger students.

Although KDE hosted a webinar concerning Kentucky's new definition of *bullying*, KDE has not issued formal written guidance on this topic. Furthermore, KDE has not updated its statewide student discipline guidelines since 2003 even though KRS 158.148 requires updates, as needed, by August 31 of even-numbered years.

District And School Variations In Codes of Acceptable Behavior And Discipline. Ideally, consequences for violations should not differ across the state. Yet codes of conduct differ between districts and even within districts. KRS 158.148 requires that each local board of education adopt its own district code of acceptable behavior and discipline. KRS 158.148 does not allow schools to modify the district code; however, OEA staff encountered several instances where schools had enacted their own codes of acceptable behavior.

Recommendation 4.2
Clarification is needed to determine whether schools may institute codes of acceptable behavior and discipline that differ from their district's code of acceptable behavior and discipline.

Data Integrity Issues

Maintaining school safety requires accurate data on student behaviors and district and school compliance.

Discipline Referrals. Discrepancies exist among discipline referral forms, School Wide Information System (SWIS) data, and discipline data recorded in Infinite Campus (IC), the student information system. Some of the discrepancies may arise from data entry errors and differing interpretations of some terms for violations and disciplinary actions. Discrepancies could also exist because districts make changes to their behavior data as late as October 1 during the KDE verification process.

Recommendation 4.1
KDE should consider writing ad hoc reports in Infinite Campus that mirror the SWIS reports. This would avoid double keying, thereby saving time, increasing accuracy, and making IC reports more accessible for review on a regular basis. It could also save districts money if they choose not to use SWIS.

Budgetary and Financial Issues

The following conclusions relate to how schools and districts spend the money allocated for school safety.

Fluctuating Allocations. Since its inception in 1998, the school safety program's budget has fluctuated between a high of $12 million in FY 2001 and FY 2002 and a low of approximately $4 million in FY 2014.

Expenses Exceed Targeted Funds. Apart from approximately 8 percent to 12 percent of allocations going to fund KCSS operations, the majority of school safety funds goes to districts.

In FY 2015, districts spent five times as much on school safety as they received from the Safe Schools Grant, and most use the flexibility allowing them to move funds between the Safe Schools Grant and other state grants in the Flexible Focus Funds. Most school safety expenditures are spent on alternative programs, followed by the expense of having school resource officers.

Funding Model. A portion of the funds originally allocated to the Safe Schools Program was intended to fund exemplary safety initiatives; however, since 2000, budgetary language has allowed KCSS to develop and implement allotment policies for all money received. A portion of the KCSS allocation is required to fund grants to be distributed by KCSS to support exemplary programs in local school districts. In 2015, KCSS distributed $1,000 to each of the seven Alternative Programs of Distinction identified by KDE.

Recommendation 2.1
The General Assembly should consider revising KRS 158.446. Historically, budget language has allowed KCSS complete discretion in how funds are allotted, contradicting KRS 158.446. The General Assembly may also wish to clarify whether KCSS should be required to fund exemplary programs out of the KCSS operating budget.

KCSS is housed at Eastern Kentucky University and pays the university indirect costs to cover general administration. Those indirect costs are slated to increase from 8 percent of total grants to 20 percent in 2017. KCSS is exploring other options.

Recommendation 2.2
Due to the possible increase in indirect costs in the future, the General Assembly may consider changes to KRS 158.443(5) to eliminate the mandate that the Kentucky Center for School Safety be administered through a university.

Outcome Issues

Demographic Variations. Although most educators perceive their schools as safe, perceptions of safety are lower in schools with above-average percentages of minority students.

Disproportionality. Males, special education students, and black students are more likely to have a behavioral violation and more likely to be suspended when committing a violation.

Recommendation 3.2
KDE should consider visiting schools with very high or very disproportionate rates of violations, suspensions, and expulsions to understand the factors contributing to these rates.

Consequences Fail to Follow Statute. KRS 158.150 requires expulsion from school for a period of not less than 1 year for a student who is determined by the board to have brought a weapon to school. Safe Schools Data show that the vast majority of students with weapons violations were not expelled.

Recommendation 3.1
KRS 158.150 requires expulsion from school for a student who is determined by the board to have brought a weapon to school. Based on statute and data provided, KDE may wish to further explore how KRS 158.150 is implemented by schools and local boards of education.

Chapter 1

School Safety

Introduction

In 1998 the General Assembly created the Kentucky Center for School Safety (KCSS), and it has allocated $144.2 million for school safety since then. Some forms of school safety include classroom management techniques, severe weather drills, and lockdown drills.

Ensuring school safety is a broad mandate, encompassing not only classroom management but also planning for and managing emergencies such as severe weather or lockdowns. School administrators and staff are responsible for ensuring a safe environment not only inside the school building and on school grounds, but also at bus stops, on buses, and at school-sanctioned events in any location. Under certain circumstances, school officials are even required to protect students in cyberspace.

During the 1998 legislative session, the General Assembly created the Kentucky Center for School Safety (KCSS) and made an original allocation of funds for KCSS operating expenses and funds to be distributed to districts through the state school safety grant program. Since 1998, the General Assembly has allocated a total of $144.2 million to KCSS.

In December 2015, the Education Assessment and Accountability Review Subcommittee (EAARS) directed the Office of Education Accountability (OEA) to examine how well local and state officials are carrying out their statutory duties related to school safety, and also to examine the tracking of student offenses reported to the Kentucky Department of Education (KDE) and KCSS. This report also includes financial information related to how Safe School Funds are disbursed and expended.

Organization Of This Report

Chapter 1 reviews the purpose and duties of KCSS as well as statutory duties of the Kentucky Department of Education (KDE) and local districts and schools.

Chapter 1 provides a summary of conclusions and recommendations, and an overview of the purpose and duties of KCSS. It also provides the statutory duties of KDE, local districts, and schools.

Chapter 2 covers budget trends and use of the Flexible Focus Fund program.

Chapter 2 provides the General Assembly's Safe Schools budget allocation since the inception of the program in 1999. This chapter also includes 5-year budget trends for KCSS and local school district expenditures. Chapter 2 also examines the number of

districts that shifted funds within the Flexible Focus Funds program, as well as the total dollar amounts shifted.

Chapter 3 discusses trends in behavior data.

Chapter 3 examines trends in behavior incidents that resulted in law or board violations. Trend data include data by race, gender, grade level, socioeconomic status, and special education status

Chapter 4 includes exemplary practices as well as school safety issues and concerns.

Chapter 4 discusses exemplary practices and programs identified by KDE or KCSS. Emerging school safety issues and concerns raised on site visits are also discussed.

Study Objectives, Methodology, And Data Sources

The report provides legislators information on compliance with school safety laws and identifies emerging issues raised during site visits.

The primary purpose of this study is to provide legislators with information about how well state officials, districts, and schools are complying with laws related to school safety. In addition, the study analyzes expenditures from the Safe School allocations, as well as expenditures from other sources. The study also identifies emerging issues and concerns voiced to OEA staff during district and school site visits that may be of interest to legislators.

Staff analyzed district annual financial reports, discipline data, and Teaching, Empowering, Leading, and Learning (TELL) survey data from KDE. In addition, OEA staff interviewed KCSS and KDE personnel to discuss issues related to school safety. OEA staff also summarized findings from Safe School Assessments completed by KCSS. In addition, OEA staff interviewed administrators at seven districts and 11 schools.

Major Conclusions
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Laws And Policies Related To School Safety

> Legal requirements on school safety are numerous. Appendix A includes an analysis of statutes dealing with school safety.

Laws governing school safety in Kentucky form a complex web of statutory requirements that cover everything from building safety and emergency management to discipline and reporting of incidents occurring on, around, and occasionally off campus. The legal requirements are numerous, often involving the cooperation of multiple agencies that also have specific statutory requirements to fulfill.

Appendix A includes an analysis of statutes dealing with school safety.

Creation Of Kentucky Center For School Safety

> In 1998, the Kentucky Center for School Safety was created along with data collection requirements.

Kentucky's earliest school safety statutes focused on discipline, epidemics, and disaster preparedness. Shortly following a shooting at Heath High School in 1997, legislation was drafted to respond to the changing scope of school safety issues. In 1998, the School Safety Bill (HB 330) created KCSS, included data collection requirements, and promoted an increased focus on improving school safety resources for schools and districts.

Bullying Prevention And Definition

> The Bullying Bill enacted in 2008 requires the development of discipline codes; however, *bullying* was not defined in statute until 2016.

Over the last few decades there has been increased interest in bullying. The Bullying Bill (HB 91) enacted in 2008 required that KDE, in collaboration with KCSS and other stakeholders, develop statewide student disciplinary guidelines that districts may use to guide the development of their own discipline codes. It also amended the Harassment and Harassing Communications statutes and enacted new reporting requirements at the school level. HB 91 did not create a statutory definition for *bullying*; however, the General Assembly defined *bullying* with the passage of SB 228 during the 2016 regular session.

Section 1. KRS 158.148 is amended to read as follows:
(1) (a) As used in this section, "bullying" means any unwanted verbal, physical, or social behavior among students that involves a real or perceived power imbalance and is repeated or has the potential to be repeated:

> 1. That occurs on school premises, on school-sponsored transportation, or at a school-sponsored event; or
> 2. That disrupts the education process.

(b) This definition shall not be interpreted to prohibit civil exchange of opinions or debate or cultural practices protected under the state or federal Constitution where the opinion expressed does not otherwise materially or substantially disrupt the education process.

Emergency Response Management Plans

Laws governing emergency management in schools were overhauled in 2012 by measures that included building safety and emergency drill requirements.

Following the Sandy Hook Elementary shooting in Newtown, Connecticut, in 2012, the General Assembly passed HB 354 (Senate Bill 8), codified as KRS 158.162, to overhaul emergency management in schools. KRS 158.162 provides the bulk of law related to emergency management, including building safety and emergency drills. KRS 158.162 requires a written plan to prevent, mitigate, prepare for, respond to, and recover from emergencies.

Table 1.1 lists emergency management policies that schools and districts must address. The related statutes and their requirements are also included.

Table 1.1
Required Emergency Management Policies

Emergency Plan/Procedure	Statute	Requirements
Emergency plan (school council)	158.162	Procedures for fire, severe weather, earthquake, and lockdown See also KRS 160.345(i)(9).
Primary and secondary evacuation routes (school council)	158.162	Establish route for every room and post in each room next to doorway used for evacuation.
Severe weather safe zones (school)	158.162	Identify zones with help of National Weather Service and Federal Emergency Management Agency.
Practices to follow after earthquake (school council)	158.162	See also KRS 158.163.
Controlling access to building (school council)	158.162	Includes but is not limited to • exterior doors during school day; • front entrance (electronic or greeter); • individual classrooms (ideally to be locked during school day); • requirement that visitors report to front office, show ID, and state purpose of visit; and • requirement that visitors must wear badge.
Emergency drills (school council)	158.162	Must include • one severe weather and earthquake drill, • one lockdown drill in the first 30 days of school year and again during January, • fire drills as required by administrative regulations, and • invitation to first responders to observe.
Emergency preparedness procedure system*	158.163	Earthquake and tornado procedures, including but not limited to • school building disaster plan; • drop procedure; • safe area; • protective measures before, during, and after earthquake or tornado; and • program to ensure students and certified staff are aware of and properly trained in procedures.
Lockdown procedure	158.164	Procedures to perform a lockdown including • protective measures during and following lockdown, • invitation of local law enforcement, and • at least two drills (beginning of school year and in January).

*Each local school board must establish an emergency preparedness procedure system in each school having 50 or more students or more than one classroom. In addition, the local board must require each school council to adopt all other plans and procedures listed in this table.
Source: Staff compilation.

The development of an emergency plan is governed by two statutes. The emergency plan is described in KRS 158.162 but is also mentioned briefly in KRS 160.345(2)(i)9, which requires each school-based decision-making (SBDM) council to adopt the plan. The emergency plan must include procedures for fire, severe weather, earthquake, and building lockdown. The emergency plan is exempt from disclosure under the Open Records statutes. Table 1.2 lists each required drill, frequency, and procedures. Although there are different types of lockdowns—for example, hard versus soft lockdowns—the statutes do not specify types of lockdowns.

Table 1.2
Required Drills

Drill	Statute	Frequency	Procedures
Fire	158.162	1 per month and 1 additional within first 30 days of school.	Department of Housing Regulation sets procedures. Invite first responders whenever possible.
Earthquake	158.162, 158.163	At least 1 during first 30 days of school; at least 1 in January	Local board creates procedure for each school. Practice drop procedure and safe area procedure twice each year (minimum). Incorporate National Weather Service and Federal Emergency Management Agency in determining safe areas. Invite first responders whenever possible. Require training.
Severe weather (tornado)	158.162, 158.163	At least 1 during first 30 days of school; at least 1 in January	Local board creates procedure for each school. Practice drop procedure and safe area procedure twice each year (minimum). Incorporate National Weather Service and Federal Emergency Management Agency in determining safe areas. Invite first responders whenever possible. Required training.
Lockdown	158.162, 158.164	At least 1 during first 30 days of school; at least 1 in January	School-based decision-making council or principal creates procedure. Invite first responders to help craft procedures and, whenever possible, observe drills. Inform students and staff annually of procedure. Statute does not specify type of lockdown.

Source: Staff compilation.

District Codes Of Acceptable Behavior And Discipline

Each district must adopt a district code of acceptable behavior and discipline that outlines the behavior expected from each student in the district and must be updated every 2 years. School councils are to select and implement appropriate discipline and classroom management techniques.

The development of statewide guidelines and district codes of acceptable behavior and discipline is governed by KRS 158.148. A district code of acceptable behavior and discipline contains the type of behavior expected from each student, the consequences of failure to obey the standards, and the importance of the standards to maintaining a safe learning environment. District codes of conduct must be updated no less frequently than every 2 years. Within each district, the superintendent, or designee, is responsible for overall implementation and supervision of the code of conduct. Within each school, the school principal is responsible for the administration and implementation of the code of conduct and each school council selects and implements appropriate discipline and classroom management techniques required to carry out the code schoolwide. By August 31 of each even-numbered year, KDE is required to develop (or update) guidelines, recommendations, and a model policy for use in developing district codes of acceptable

behavior and conduct; KDE must also distribute them to school districts. The guidelines and recommendations distributed by KDE are to be developed in cooperation with the Kentucky Education Association, the Kentucky School Boards Association, the Kentucky Association of School Administrators, the Kentucky Association of Professional Educators, the Kentucky Association of School Superintendents, "the Parent-Teachers Association," the Kentucky Chamber of Commerce, the Farm Bureau, members of the Interim Joint Committee on Education (IJCE), and other interested groups.

Suspensions And Expulsions

KRS 158.150 delineates potential reasons a student can be suspended or expelled from school. Expulsion is required if a student brought an unlawful weapon to school.

Suspension and expulsion of students is regulated by KRS 158.150. The statute delineates potential reasons for suspension or expulsion, including willful disobedience, use of profanity, assault or battery or abuse of other students or staff, the use or possession of alcohol or drugs, the carrying or use of weapons on school property, and other bad conduct on school property or off school property at school-sponsored events. Furthermore, KRS 158.150 mandates that districts adopt policies for mandatory expulsion, for at least 1 year, if a student has been found to have brought an unlawful weapon to schools under its jurisdiction. Districts are required to establish policies requiring disciplinary actions, up to and including expulsion from school, for a student who is determined by the board to have possessed illegal drugs for the purpose of sale or distribution at a school under its jurisdiction.

Students are entitled to due process prior to suspension or expulsion, unless suspension is essential to protect property or people. Expelled students must be offered appropriate educational services, unless doing so would pose a safety threat.

Unless immediate suspension is "essential to protect persons or property or to avoid disruption of the ongoing academic process," prior to suspension or expulsion, students' due process rights entitle them to receive oral or written notice of the charges against them, explanation of the evidence of the charges, and an opportunity to present the student's version of the facts related to the case (KRS 158.150). When students are expelled, they must be offered appropriate educational services, unless doing so would pose a threat to the safety of students or staff. Exceptional children cannot be suspended or expelled if the behavior is related to the student's disability, unless not doing so poses a threat. Primary school students must not be suspended unless their presence poses a threat to their safety or that of staff or other students.

School Resource Officers

The definition of school resource officer (SRO) is provided in KRS 158.441. According to the statute, SROs are required to have specialized training to work with youth at a school site. The statute formally recognizes SROs as occupying a specialized field within law enforcement. Furthermore, the statute recognizes the importance of having a written contract between agencies to clarify the duties of the SRO.

Roles And Responsibilities

There are several key players with statutory rights and responsibilities to ensure school safety and discipline, including

- the KCSS board and KCSS,
- KDE and the Kentucky Board of Education,
- local school boards and school districts,
- SBDMs,
- juvenile delinquency prevention councils,
- parents and guardians, and
- emergency responders.

The paragraphs below delineate many of the rights and responsibilities of these actors.

Board Of Directors Of Kentucky Center For School Safety

The KCSS board of directors is appointed by the governor for terms of 2 years. The board meets at least four times per year.

The KCSS board of directors is governed by KRS 158.443. Members of the KCSS board of directors are appointed by the governor, serve terms of 2 years, and may be reappointed, but they cannot serve more than two consecutive terms. The board meets at least four times per year and must annually approve a work plan, budget, and operating policies. The board also makes recommendations regarding grants to assist in the development of programs and individualized approaches to working with violent, disruptive, or academically at-risk students. The board is also charged with developing model interagency agreements between local school districts and other local public agencies.

Kentucky Center For School Safety

KCSS' mission includes data analysis, research, dissemination of information on successful safety programs and new programs, It also is to collaborate with KDE.

The responsibilities of KCSS are described in KRS 158.442. KCSS is to work collaboratively with KDE and others to provide technical assistance. The mission of KCSS is to be a central point for data analysis, research, dissemination of information about

successful school safety programs, research results, and new programs. KCSS is charged with administering a school safety grant program for local districts as directed by the General Assembly, promoting interagency efforts to address discipline and safety issues, establishing a clearinghouse for information and materials concerning school violence prevention, and providing program development and implementation expertise and technical support to schools, law enforcement agencies, and communities. KCSS serves a role in researching and evaluating school safety programs throughout the state, analyzing data collected in compliance with KRS 158.444, and disseminating information regarding best practices in creating safe and effective schools. KCSS must also advise the Kentucky Board of Education and IJCE on administrative policies and regulations, and it must provide a report by July 1 of each year to the governor, the state board, and IJCE regarding the status of school safety in Kentucky.

Kentucky Board Of Education And Kentucky Department Of Education

KDE maintains the statewide data collection system on school safety and is to provide a statistical report to the Office of Education Accountability and the Education Assessment and Accountability Review Subcommittee by August 31 each year.

KRS 158.444 directs the Kentucky Board of Education to promulgate appropriate regulations for school safety, student discipline, and related matters. KDE collaborates with KCSS, establishes and maintains a statewide data collection system, provides data from the statewide data collection system to KCSS, and provides an annual statistical report to OEA and EAARS by August 31 of each year. KRS 158.448 states that KDE must also develop protocols for providing notice to schools of offenses committed by students transferring to a new school or district. KDE must also assure that students' privacy rights are maintained in accordance with all federal and state statutes. KDE also provides the Juvenile Justice Oversight Council (JJOC), created by KRS 15A.063, the information received from local schools pursuant to KRS 158.449. JJOC reviews information received from KDE and determines whether any other action is necessary including additional performance measures, funding, or legislation.

Local School Districts

Districts are required to conduct a district level assessment on school safety and develop codes of acceptable behavior and determine instructional placement options for threatening or violent students.

KRS 158.444(2)(b) requires local school districts to report required information to KDE disaggregated by students' sex, race, and grade level. Local school districts must also conduct a district-level assessment of issues based on identified safety and discipline issues and created in consultation with requisite stakeholders. Local school districts develop codes of acceptable behavior and determine instructional placement options for threatening or

violent students. Appendix B includes districts' policies related to school safety.

Schools And SBDM Councils

Schools provide an annual report of school safety incidents. The reports indicate whether incidents involved public offenses or noncriminal misconduct. Furthermore, the reports indicate whether incidents were reported to law enforcement or were initiated by a school resource officer.

Schools are responsible for ensuring that information gathered under KRS 158.444(2)(b)1 is placed in students' disciplinary records. Schools also provide an annual report of school incidents, including whether the incident involved a public offense or noncriminal misconduct, whether the incident was reported to local law enforcement, and whether the report was initiated by an SRO. KRS 160.345(2)(i)7 empowers school councils to select and implement discipline and classroom management techniques as part of a comprehensive school safety plan.

Parents

Under the Kentucky Family Education Rights and Privacy Act, parents, legal guardians, and other persons exercising custodial control have the right to inspect and challenge student records.

According to KRS 158.444(5), parents, legal guardians, and other persons exercising custodial control or supervision have the "right to inspect or challenge the personally identifiable student records as permitted under the Kentucky Family Education Rights and Privacy Act and the federal Family Educational Rights and Privacy Act and implementing regulations."

Chapter 4 goes into greater depth about the extent to which different agencies ensure that school safety statutes and policies are implemented with fidelity.

Chapter 2

Safe Schools Revenue And Expenditures

Introduction

Chapter 2 analyzes appropriations by the General Assembly for Safe School Funds as well as how funds are expended at the district level and by the Kentucky Center for School Safety.

This chapter analyzes the General Assembly's appropriations of Safe School Funds, KCSS and district allocations, district expenditures, and budget language allowing districts the opportunity to move funds within the Flexible Focus Fund (FFF). Chapter 2 also presents how much districts are spending on general fund expenditures that were authorized in the 2015-2016 biennial budget.

General Assembly Appropriations

Since the inception of the Safe Schools Program, the General Assembly has appropriated $144.2 million to it.

In the 1998 legislative session, the General Assembly made appropriations for the school safety program. Over the last 17 years, the General Assembly has appropriated a total of $144.2 million to the Safe Schools Program. As seen in Figure 2.A, in FY 1999, $5 million was appropriated to the Safe Schools Program; in FY 2000, the appropriation increased to $10 million. The FY 2001 and 2002 allocations were the highest, at $12 million each year. From FY 2009 to FY 2014, due to the economic recession, the funding dropped below the initial allocation of $5 million. Approximately $7.2 million was appropriated in FY 2015; appropriations then rose to $10.3 million in FY 2016.

Figure 2.A
General Assembly Allocations To The Safe Schools Program
FY 1999 To FY 2016
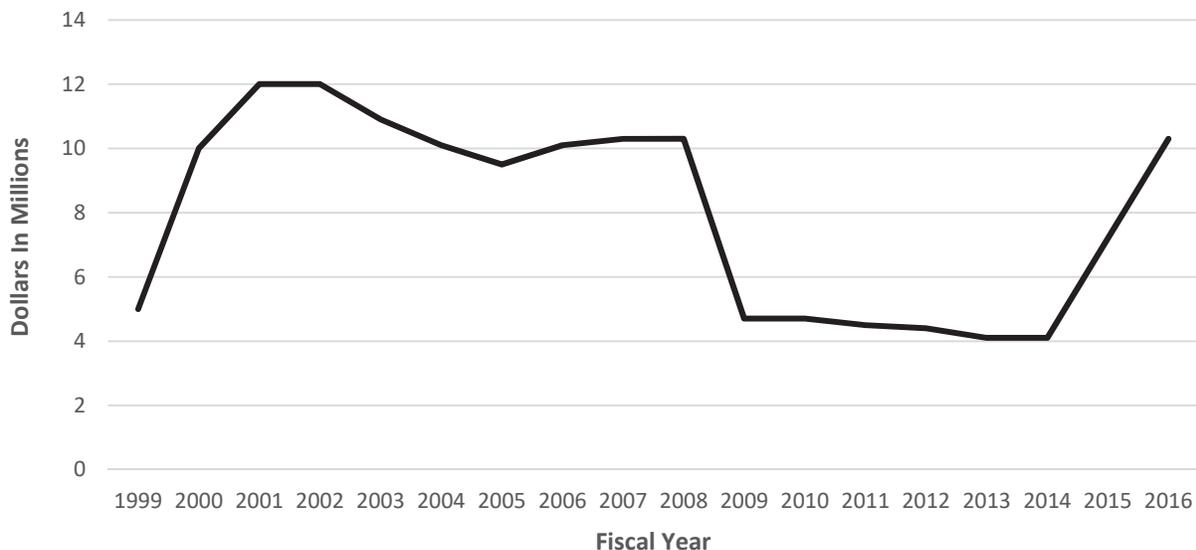
Source: Staff analysis of budget bills.

Uses Of Appropriated Funds

Safe School Funds are to be used to improve school safety and student discipline through alternative programs and intervention services in compliance with

- KRS 158.148 (defines *bullying*, provides discipline guidelines and a model policy, requires a local code of acceptable behavior and discipline, and specifies the required contents of that code),
- KRS 158.150 (provides requirements regarding suspensions and expulsions), and
- KRS 158.445 (addresses local assessment of school safety and school discipline, district assessment, and local plans).

Safe School Funds distribution is governed by KRS 158.446. However, since 1999 budgetary language has overridden this statute.

KRS 158.446 governs how Safe School Funds are divided between KCSS and districts. Ten percent of appropriations is to be used for the operation of KCSS, with the remaining funds distributed to districts.

Although KRS 158.446 also specifies how district funds are to be distributed, since 1999 budgetary language has overridden these directives. Consistent with budget language, KCSS has retained between 8 percent and 12 percent of the appropriations for operational expenditures. KRS 158.446 directs KCSS to distribute

funds to support exemplary programs at the district level. After exemplary programs are funded, any leftover funds must be divided, on a per-pupil basis, and distributed to all districts. However, in the same year that KRS 158.446 was passed, the General Assembly inserted language into the biennial budget (HB 321) that overrode the distribution of funds prescribed by KRS 158.446. HB 321 included an application process that set eligibility guidelines and funding levels for grants, with first priority going to alternative programs as well as other programs that could be funded. Budget language passed in the 2000 regular session, HB 502, gave KCSS the authority to develop and implement allotment policies for all money received. This language has been included in each subsequent budget bill.

Recommendation 2.1

Recommendation 2.1

The General Assembly should consider revising KRS 158.446. Historically, budget language has allowed KCSS complete discretion in how funds are allotted, contradicting KRS 158.446. The General Assembly may also wish to clarify whether KCSS should be required to fund exemplary programs out of the KCSS operating budget.

Allocation Of General Assembly Appropriations

Allocations To School Districts

The KCSS board determines how Safe School Funds are distributed to districts. Districts receive a base amount, with any remaining funds distributed on a per-pupil basis.

The KCSS board decides the amount of funds allocated to school districts and the amount of funds KCSS needs for operating expenses. Since FY 2000, the KCSS board has voted for districts to receive a base amount of funding and for the remaining funds to be divided among districts on a per-pupil basis. Exceptions are made for the Kentucky School for the Blind (KSB) and the Kentucky School for the Deaf (KSD). KSB and KSD receive only the district base amount, with no extra per-pupil amount. Table 2.1 shows the distribution of funds for the past 6 years.

Table 2.1
Safe Schools Grant Allocations, FY 2011 To FY 2016

Fiscal Year	District Base	Per Pupil	Total
2011	$9,000	$3.60	$3,715,670
2012	9,000	3.42	3,639,370
2013	9,000	2.90	3,326,470
2014	9,000	2.88	3,315,459
2015	14,500	6.28	6,353,800
2016	20,000	9.52	9,278,298

Source: Staff summary of Safe Schools Grant Allocations from the Kentucky Center for Safe Schools.

Allocations To KCSS

> KCSS retains 8 percent to 12 percent of the total Safe School appropriations for their operating expenses each year. KCSS contracts with Murray State University and the Kentucky School Boards Association to provide support and training.

From 2011 to 2014, the KCSS board approved roughly 8 percent of the total Safe School allocations for KCSS operating expenses; this amount translated to approximately $4 million for the 4 years. In FY 2015, KCSS' share was $915,000, or 12 percent. In FY 2016, KCSS' budget increased to $1.1 million, but was, at 10.7 percent, a smaller share of the total allocation.

KCSS collaborates with Murray State University (MSU) and the Kentucky School Boards Association (KSBA) to provide support and training for school safety. Figure 2.B includes a breakdown of each of these budgets.

As reflected in Figure 2.B, the KCSS total budget for FY 2016 was almost $1.1 million. Of the total KCSS budget, $191,136 was used to fund KSBA's Safe School efforts, and $133,229 was used to fund KCSS' collaboration with MSU; the remaining $775,634 was used to fund KCSS' internal operations.

The figure further breaks out how much each organization spent on salaries and benefits, service dollars, indirect cost, operating expenses, and travel.

> The largest portion of KCSS expenses is for employee salaries and benefits, followed by service dollar expenditures. Service dollar expenditures are used to pay consultants who perform Safe School Assessments.

Service Dollars. The majority of the increase in 2016 allocations restored funding cuts made to safety assessment examiners' per diem. In FY 2016, the examiners' per diem increased to $300 per day from $200 per day in FY 2012-2015. This increase is reflected in the 2016 KCSS service dollar budget in figure 2.B. The service dollar category captures the cost of consultants used for training, as well as the cost of performing Safe School Assessments.

Figure 2.B
Kentucky Center For School Safety Budget By Cost Center, FY 2012 To FY 2016
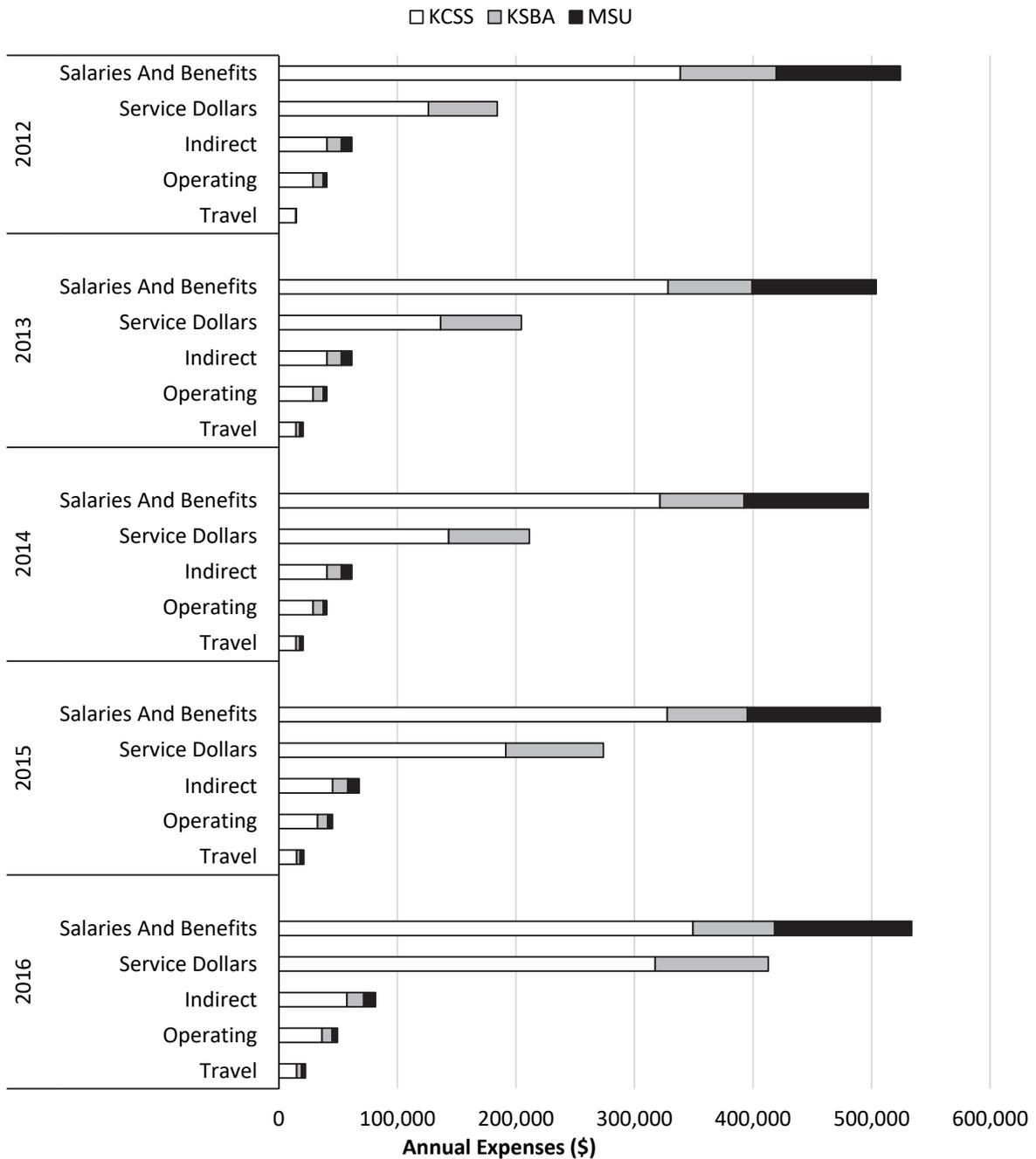
Source: Staff summary of information from the Kentucky Center for Safe Schools.

Salaries And Benefits. The salary and benefit expenses for KCSS were almost $350,000 in FY 2016. This paid for a full-time director, an associate director, a part-time outreach specialist, a full-time project assistant, and undergraduate student workers. The

operating expenses were almost $36,500, which covered costs associated with telephone, postage, and printing.

The FY 2016 KSBA Safe Schools budget, seen in Figure 2.B, includes just more than $69,000 for salaries and benefits for a full-time training coordinator, an administrative assistant, and one-quarter of the salary of the director of Student Support and School Safety. The operating cost was approximately $8,500 for supplies and printing, with approximately $95,000 for service activities for Safe School Assessments and training administered to district and school staff.

The MSU budget includes funds for part of the salary and benefits of the director of Safe Schools Resource Centers, along with three-quarters of an administrative assistant's position.

Eastern Kentucky University (EKU) houses KCSS and charges an indirect cost rate of 8 percent for state grants. EKU increased the rate to 15 percent in FY 2017 and will increase it again to 20 percent in FY 2018. The dean of the College of Justice and Safety at EKU is covering any indirect cost above the 8 percent to keep KCSS from moving to another university.

Indirect Cost. Because KCSS is housed at EKU, all funds going to KCSS are subject to an indirect cost charge by EKU to cover general management for administrative activities. Some necessary operational costs for EKU include accounting, payroll preparation, personnel services, and purchasing. EKU has always charged an 8 percent indirect cost rate for management of state contracts; however, EKU has advised KCSS that EKU will increase its indirect cost rate to 15 percent of total grants for FY 2017 and to 20 percent in FY 2018. Because of the indirect cost rate increase from EKU, the KCSS board has considered releasing a request for proposals to be housed at a different university. The dean of the College of Justice and Safety at EKU has met with the KCSS board and offered to pay any difference in the indirect cost rate above 8 percent, if EKU persists in pursuing a higher rate.

KCSS has developed strategies to avoid paying EKU some indirect cost fees for being housed at the university. For example, instead of sending the MSU portion of KCSS funds to KCSS, KDE sent MSU funds directly to MSU, thereby lowering the amount of the grant. Regarding the portion of KCSS funds that is subcontracted to KSBA, EKU has agreed to allow KCSS to fund its partnership with KSBA for one more year at the 8 percent indirect cost rate, during which time KCSS will explore other options to fund KSBA for FY 2018. While KCSS will not have to deal with this increase in FY 2017, it is possible that this issue could arise again in the future.

Recommendation 2.2

Due to the possible increase in indirect costs in the future, the General Assembly may consider changes to KRS 158.443(5) to eliminate the mandate that the Kentucky Center for School Safety be administered through a university.

KYCID

KDE endorses the Positive Behavior Interventions and Supports framework to help schools with behavior and closing the achievement gap. The Kentucky Center for Instructional Discipline is funded to support this initiative.

KCSS administers the Kentucky Center for Instructional Discipline (KYCID). KYCID is funded solely from IDEA B discretionary funds from KDE. KYCID is responsible for implementing the Positive Behavior Interventions and Supports (PBIS) framework in schools across Kentucky.

KDE endorses the use of PBIS, which includes a multitier approach to the early identification and support of students with learning and behavior needs using the Response to Intervention process, as well as closing the achievement gap between student groups. PBIS is an evidence-based practice that staff use as an intervention to address behavioral and academic competence for all students. KYCID operates on a $3.5 million memorandum of agreement (MOA) or $700,000 per year over the 5-year period.

Flexible Focus Funds

Districts have to ability to shift funding among the Safe Schools, preschool, professional development, textbooks, and Extended School Services state grants, referred to as flexible focus funds; however, funds can't be shifted out of the preschool grant.

The General Assembly authorized the Flexible Focus Fund in the 2003 budget. This flexibility was continued in subsequent budgets. FFF allows districts the flexibility to move funds among five state grants to better address local needs. Funding shifts are permitted within the Safe Schools, preschool, professional development, textbooks, and Extended School Services allocations. The only caveats are that no funds can be shifted out of the preschool program, program funds still have to comply with governing statutes, and funds must serve the needs of the intended student populations.

Table 2.2 shows the number of districts that moved funds in and out of the Safe Schools Grant over the most recent 5-year period, as well as the lowest, highest, and average amount moved along with the net movement across the state for the Safe Schools Grant.

Table 2.2
Safe Schools Flexible Focus Fund Usage, FY 2011 To FY 2015

Movement In Fiscal Year		Number Of Districts	Range Of Funds Moved			Total Funds Moved	Net Funds Moved
			Lowest	Average	Highest		
2011	In	44	$75	$28,565	$516,439	$1,228,312	$1,024,026
	Out	26	-191	-7,857	-27,077	-204,286	
2012	In	38	208	34,000	537,962	1,258,362	1,065,233
	Out	32	-10	-6,035	-43,094	-193,130	
2013	In	36	44	18,532	240,144	667,166	547,962
	Out	31	-9	-3,845	-21,261	-119,209	
2014	In	39	17	19,641	234,466	746,377	571,738
	Out	32	-136	-5,457	-15,382	-174,639	
2015	In	22	19	61,803	384,224	1,359,670	827,549
	Out	53	-386	-10,040	-100,463	-532,121	

Source: Staff summary of Annual Financial Reports from the Kentucky Department of Education.

Over the last 5 years, more funds have been moved into the Safe Schools Grant than out due to the Flexible Focus Funds authorization.

As reflected in Table 2.2, for all years except 2015, more districts moved funds into the Safe Schools Grant from other Flexible Focus Funds than moved funds out of it. For example, in FY 2011, 44 districts moved Flexible Focus Funds into the Safe Schools Grant, which netted an increase of more than $1 million. In 2015, when the General Assembly increased appropriations for Safe Schools, the number of districts moving funds into the Safe Schools Grant was smaller than the number moving funds out; however, the net increase was $827,549.

Expenditures

Districts expenditures on safe schools come not only from the Safe Schools Grant, but also from several other state and federal grants. Districts spent more than $34 million on school safety in FY 2015.

This section discusses school districts' expenditures as recorded on annual financial reports. The funds spent on school safety expenditures include not only the Safe School Grant, but also funds from the general fund; local grants; state grants such as Kentucky Educational Collaborative for State Agency Children, Department of Juvenile Justice Day Treatment programs, Extended School Services, and Professional Development; and federal grants such as Title 1, Title VI–rural education, and Title IV–Safe and Drug Free grants.

Total Expenditures

School districts spent more than $34.32 million on expenditures related to school safety in FY 2015. As reflected in Figure 2.C, this is about $4.5 million more than in FY 2014. The difference could be, in part, due to the increase in appropriations by the General

Assembly. Even with this increase, FY 2015 expenditures were less than FY 2012 expenditures when the General Assembly appropriated less funds.

Figure 2.C
Total Safe Schools Expenditures, FY 2011 To FY 2015
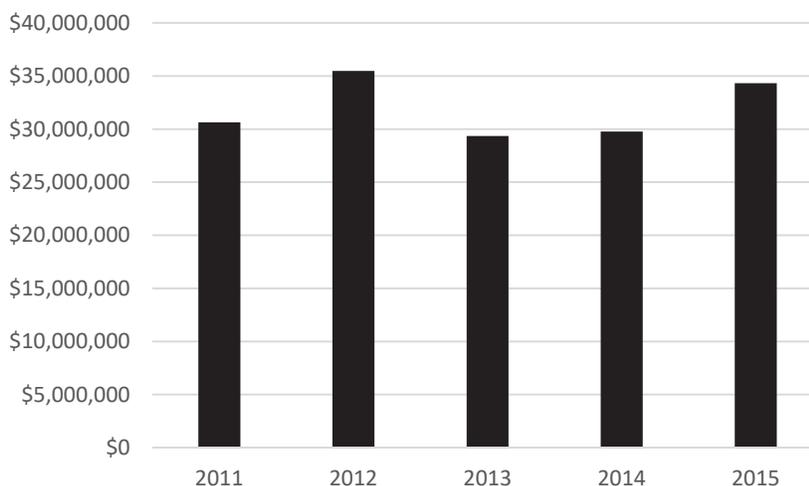
Source: Staff summary of Annual Financial Reports from the Kentucky Department of Education.

Expenditures By Expense Object Code

Districts' annual financial reports include expenditures that are reported by several classifications. One classification is by expense object code. This code is used to group actual expenses into categories that describe the nature of the goods or services purchased.

Districts' largest school safety expenses are for salaries and benefits followed by professional and technical services, which pays for school resource officers.

Table 2.3 breaks out the 2015 Safe Schools expenditures by object codes. The majority of funds spent on school safety were for salaries and benefits, which amounted to almost $29 million or 84 percent of the total expenditures. About $2.3 million, or 7 percent of the total expenditures, was spent on professional and technical services. These expenses included amounts paid to people or firms with specialized skills. SROs on contract with the district may be coded here along with mental health specialists, counselors, and social workers. Other expenses that are classified in this group include professional training and development services, as well as registration fees and drug testing.

Expenses for capital assets and miscellaneous expenditures, along with supply expenses, constitute about 4 percent of districts' total expenses, leaving a small amount, or 1 percent, spent on property

and service contracts. Expenses made from the property and services codes include utilities and building/equipment repairs.

Table 2.3
Safe Schools Expenditures By Expense Code, FY 2015

Expenditure	Total Cost
Salaries and Benefits	$28,946,204.63
Professional and Technical Services	2,346,245.42
Capital Assets & Miscellaneous	1,406,704.11
Supplies	1,299,069.41
Property and Service Contracts	326,378.30

Source: Staff summary of Annual Financial Reports from the Kentucky Department of Education.

Expenditures By Program Code

Program level expenditures distinguish cost from regular education, special education, preschool and alternative programs. The majority of program expenses were spent on alternative education programs. In FY 2015, 83 percent or $28.5 million, of expenditures for school safety was spent on districts' alternative education programs. Seven percent, or approximately $2.3 million, was spent on other expenditures to keep school buildings safe, and 6 percent, or approximately $1.9 million, was spent on districts' regular education programs.

Safe School Funds Spent On General Fund Expenditures

The 2015-2016 biennial budget allowed districts additional flexibility to move funds out of FFF and into the general fund to be spent on general operating expenditures. Budget language also requires that districts annually report these amounts to KDE and to IJCE. The data were reported to KDE in 2015 in districts' annual financial reports. To date, data has not been reported to IJCE.

In FY 2015, 51 districts took advantage of this flexibility, but only 7 districts used Safe School Funds for general operating expenses. The total amount of Safe School Funds used for general operating expenses was a little more than $120,000. The amounts a district transferred ranged from $3,018 to $39,030. These funds were used for salaries, supplies, and materials that normally would have been paid for with general fund dollars.

In FY 2015, more than $28 million was spent on alternative programs for school safety. This constituted 83 percent of all school safety expenditures.

The 2015-2016 budget allowed districts additional flexibility to spend Flexible Focus Funds on general operating expenditures. Fifty-one districts took advantage of this, but only 7 districts used Safe School Funds to pay for general operating expenses.

Safe Schools Revenue To Total Expenditures

Of the total Safe Schools spending at the district level, approximately 10 percent to 18 percent comes from the Safe Schools Grant.

As shown in Table 2.1 earlier in this chapter, the total revenue received from the Safe Schools Grant was $3.6 million in 2012 and $6.4 million in FY 2015. As reflected in Figure 2.C the total expenditure was $35,477,689 for FY 2012 and $34,324,602 for FY 2015. This means that, of the total Safe Schools spending in 2012, 10 percent of the funds came from the Safe Schools Grant; in 2015, 18 percent came from the Safe Schools Grant.

Site Visit Comments

During site visits, OEA asked whether districts needed any additional support or guidance from KDE or KCSS. Four of the seven districts visited identified a need for more school safety funding. Districts provided some examples of what additional funds would be spent on:

- Alternative schools
- In-school detention staff
- Updated camera and speaker systems for entryways
- School psychologist
- School counselors/social workers
- More training
- School resource officers

District administrators were happy with the support and guidance they receive from the state on school safety. However, some voiced the need for additional funds to support mental health personnel and more advanced training.

Some district administrators mentioned that the current funding distribution should change. One district expressed that the current funding formula is not equitable to larger districts, and that all funds should be distributed based on a per-pupil amount. Another district expressed that Safe Schools funds should be a legislative priority, that additional funds should be distributed based on grant applications, and that these grants should be distributed to address the latest safety issues that districts face year after year.

When OEA staff asked the schools whether they needed additional support or guidance from KDE or KCSS, almost all stated that their district provides many supports for school safety and that no additional support was needed. Of the school administrators who mentioned needing additional supports, none mentioned monetary funds. However, some of the additional support needed would result in additional costs for the district. For example, some schools needed more mental health personnel and additional, or more advanced training for staff.

Chapter 3

School Safety Data

Introduction

Chapter 3 discusses Safe Schools Data, national comparisons and highlights from the 2015 TELL Kentucky Survey.

The chapter discusses Safe Schools Data that districts are required to send to KDE. Kentucky was compared to the nation in the *Indicators of School Crime and Safety* report presented by the National Center for Education Statistics (NCES).[a] The chapter also briefly highlights Kentucky educators' perceptions based on responses to the 2015 TELL Kentucky survey.

Districts are required to have codes of acceptable behavior for all schools in the district; schools regularly have additional student handbooks.

Districts are statutorily required to have codes of acceptable behavior and discipline to apply to the students in each school operated by the board. Schools often have a student handbook that contains policies, information, and services provided in schools. These district- and school-adopted documents describe the different punishments associated with various discipline violations.

Analysis

Districts must report all behavior events resulting in an in-school or out-of-school suspension, expulsion, corporal punishment, restraint, or seclusion. A variety of behaviors must also be reported.

Districts must enter all behavior incidents resulting in an in-school or out-of-school suspension, expulsion, corporal punishment, restraint, or seclusion into the statewide student information system, Infinite Campus (IC). In addition, the following behavior violations must be reported, regardless of the resolution:
- Bullying and harassment
- Assaults or violence
- Guns or other deadly weapons
- Drugs and alcohol, including tobacco

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[a] The *Indicators of School Crime and Safety* report is based on information drawn from a variety of data sources, including national surveys of students, teachers, principals, and postsecondary institutions. Sources include results from the *School-Associated Violent Deaths Study*, sponsored by the US Department of Education, the Department of Justice, and the Centers for Disease Control and Prevention (CDC); the *National Crime Victimization Survey* and *School Crime Supplement* to that survey, sponsored by the Bureau of Justice Statistics and NCES, respectively; the *Youth Risk Behavior Survey*, sponsored by the CDC; the *Schools and Staffing Survey*, *School Survey on Crime and Safety*, *Fast Response Survey System*, *EDFacts,* and *High School Longitudinal Study* of 2009, all sponsored by NCES; the *Supplementary Homicide Reports*, sponsored by the Federal Bureau of Investigation; the *Campus Safety and Security Survey* and *Civil Rights Data Collection*, both sponsored by the US Department of Education; and the *Census of Juveniles in Residential Placement*, sponsored by the US Department of Justice.

The *Indicators of School Crime and Safety* report, which surveyed high school teachers nationwide, revealed no significant differences between Kentucky and the nation.

Kentucky And The Nation. In the *Indicators of School Crime and Safety* report, teachers' survey results concerning safety revealed no significant differences between Kentucky and the nation. As seen in Figure 3.A, most teachers (more than 80 percent) agreed that principals enforced rules; however, only two-thirds of teachers agreed that other teachers enforced rules. Four out of 10 teachers reported that student misbehavior interfered with teaching, and approximately one-third reported that tardiness interfered. Approximately one in 10 Kentucky teachers had been threatened with injury while on school property, and 7 percent had been physically attacked.[1]

Figure 3.A
Safety-Related Incidents Reported By Surveyed High School Teachers, 2012
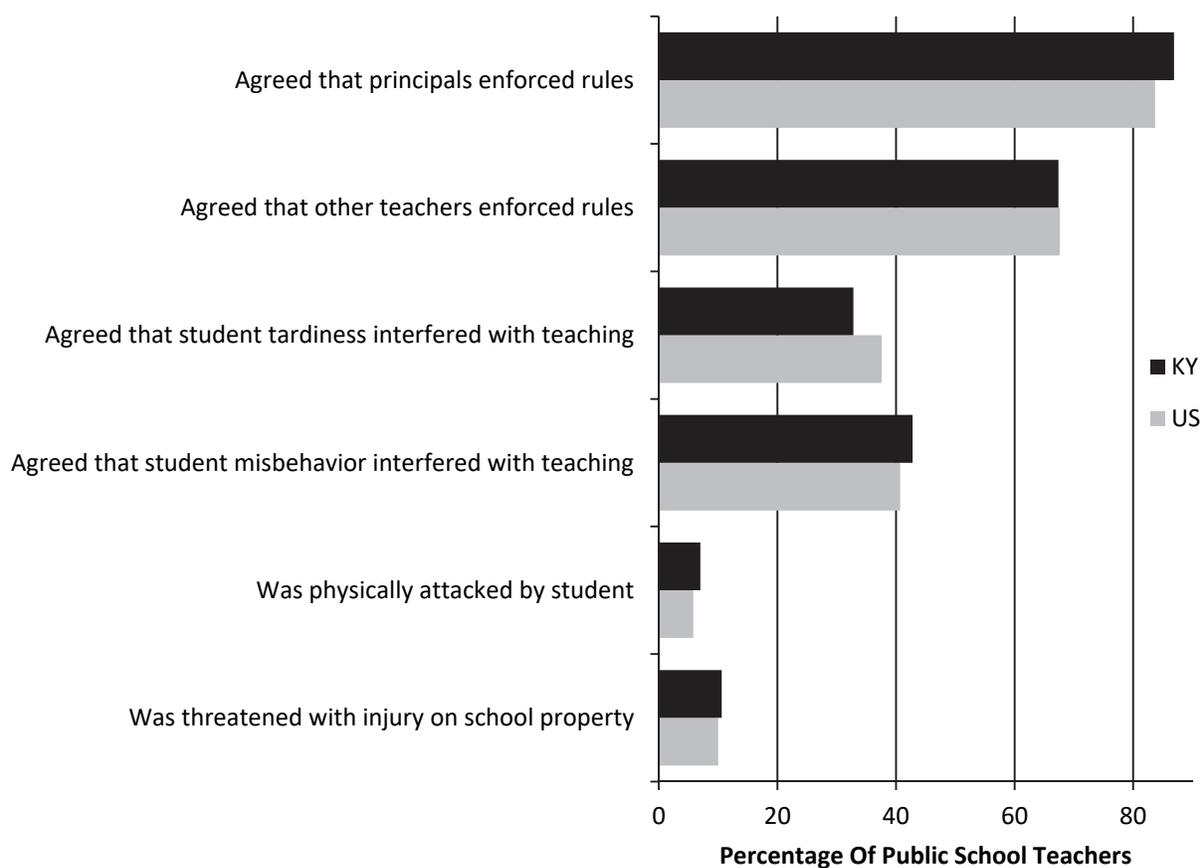
Notes: Incidents were self-reported in a survey of a representative sample of teachers and therefore subject to potential sampling error; differences between US and Kentucky were tested for statistical significance. Incidents occurred at least once in past 12 months unless otherwise noted.
Source: Staff compilation of data from US. Dept. of Educ. *Indicators of School Crime and Safety*: 2015. NCES 2016-079. Washington: USED, May 2016.

Reported use of marijuana was the only statistically significant difference between Kentucky students and the nation's.

As Figure 3.B shows, among safety-related incidents reported by surveyed high school students, the most prevalent type of incident is related to alcohol; 30.4 percent of Kentucky high school students reported using alcohol in the previous 30 days. During the previous 12 months, 20.6 percent had been offered illegal drugs on school property, 21.4 percent were bullied on school property, and 13.2 percent had been electronically bullied through email, chat rooms, instant messaging, websites or texting. While more than 20 percent of high school students had been in a physical fight, only 6 percent of students had reported fighting on school property. Kentucky high school students were also significantly less likely to use marijuana; other differences between Kentucky and the rest of the country were not statistically significant.

Figure 3.B
Safety-Related Incidents Reported By Surveyed High School Students, 2013

Percentage of Public High School Students
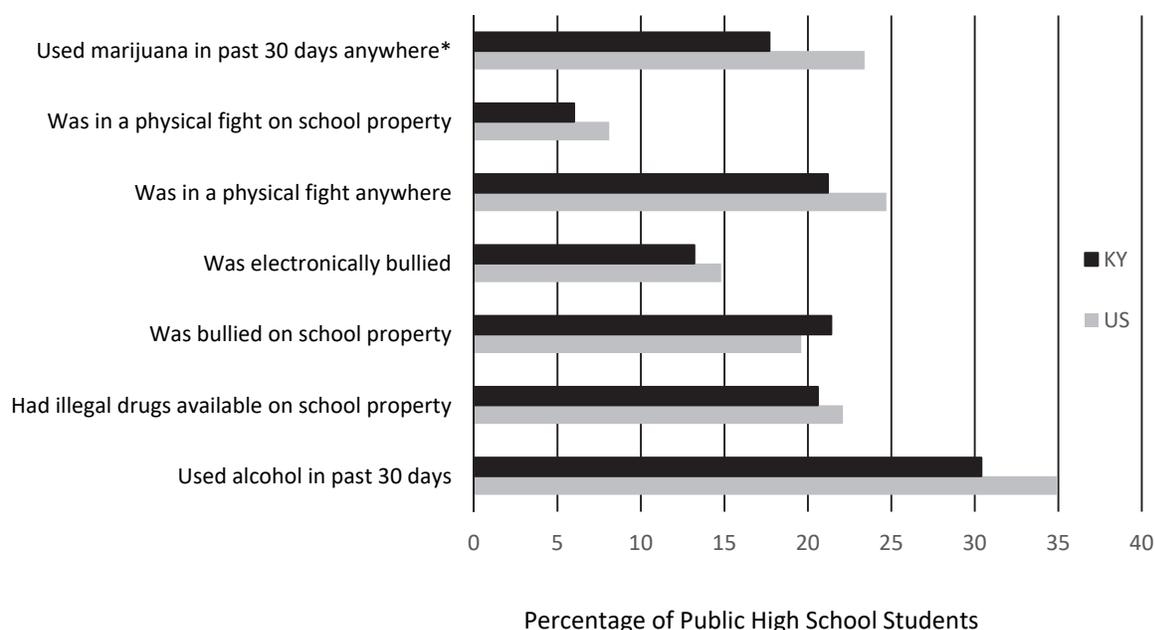
*Differences between Kentucky and US students were significant at the 95 percent significance level or greater.
Notes: Incidents were self-reported in a survey of a representative sample of students and therefore subject to potential sampling error; differences between US and Kentucky were tested for statistical significance. Incidents occurred at least once in past 12 months unless otherwise noted.
Source: Staff compilation of data from US. Dept. of Educ. *Indicators of School Crime and Safety*: 2015. NCES 2016-079. Washington: USED, May 2016.

Many student behaviors never come to the attention of authorities, and very few result in removal from school, though some may lead to in-school suspensions. The US Department of Education's Office of Civil Rights estimates that, in FY 2012, 5.35 percent of all Kentucky students received out-of-school suspensions and

0.04 percent were expelled. The national rates were 6.40 percent and 0.22 percent, respectively.[2]

Data from the Teaching, Empowering, Leading, and Learning survey indicated that 95 percent of Kentucky educators reported working in an environment that they consider safe.

Staff Perceptions. The Teaching, Empowering, Leading, and Learning survey is administered biennially by KDE. The TELL survey can be used to measure educators' perceptions of school safety. Data from the TELL survey, which was completed by almost 45,000 (89 percent) Kentucky educators in 2015, indicate that the overwhelming majority (95 percent) of educators report working in a school environment that they consider safe.

In most schools, more than 90 percent of educators reported working in a safe environment. The percentage of teachers reporting working in a safe environment was negatively correlated with the percentage of minority students in that school.

Although responses varied among schools, Figure 3.C shows that, in the overwhelming majority of schools, 90 percent or more of educators reported working in a safe environment. There were only four A1[b] schools, less than 1 percent, in which 50 percent or less of educators reported safe environments. The figure also shows that in most schools, at least one educator did not report working in a school environment that is safe.

Figure 3.C
Percentage Of Educators Agreeing That
Faculty Work In A School Environment That Is Safe
School Year 2015
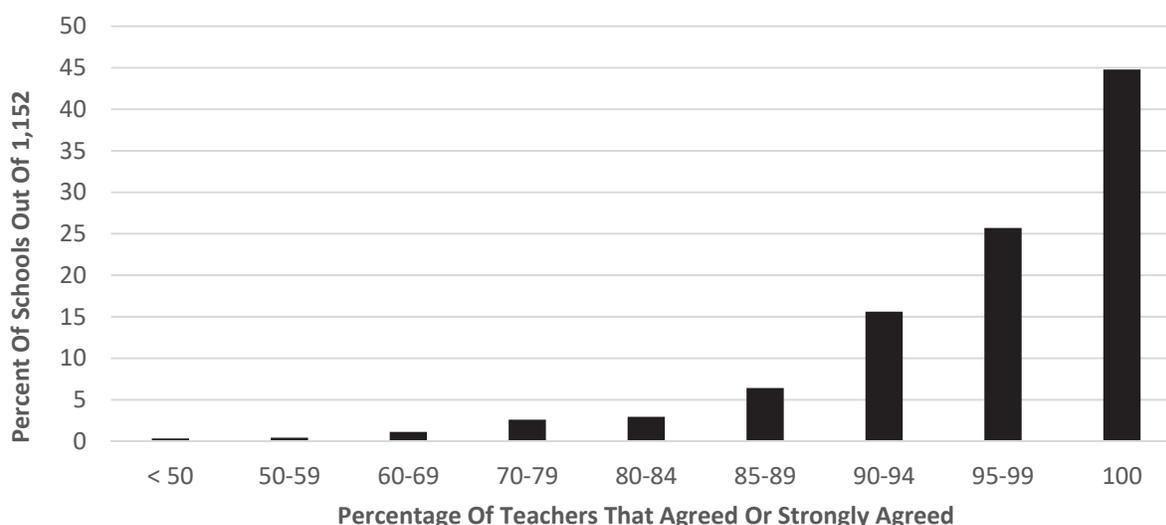
Note: Percentages do not add to 100 percent due to rounding.
Source: Staff analysis of data for A1 schools from the New Teacher Center and the Kentucky Department of Education.

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[b] An A1 school is under administrative control of a principal or head teacher and is eligible to establish a SBDM council. An A1 school is not a program operated by, or as a part of, another school. This is the most common type of school in the state.

OEA staff studied the relationship between educators' perceptions of school safety and school demographic characteristics. Educators' reports of safe school environments are associated with the demographic characteristics of their school's students. There was a moderate negative correlation between the percentage of a school's educators who reported safe environments and that school's percentage of minority students, though actual behavioral events do not support this trend. The correlation between the percentage of a school's educators who reported a safe environment and the percentage of students who qualify for free or reduced-price lunch (FRPL) was negative, but very weak. Educators' perceptions of safe working environments did not vary substantially among elementary, middle, and high schools, but educators in alternative schools were more likely to disagree that the environment is safe (12 percent, on average) than were educators in non-alternative schools (5 percent, on average) and this is supported by reported behavioral events.

> While 95 percent of educators reported working in a safe environment, only 79 percent of educators reported that students follow rules, and even fewer educators agreed that teachers and administrators were consistent in enforcing school rules.

School Safety Distinguished From School Discipline. Educators were less likely to agree with statements related to consistent school discipline than with statements related to school safety. For example, while 95 percent of educators agreed that the school environment is safe, 79 percent of educators agreed that students follow rules. Furthermore, 82 percent of educators agreed that teachers were consistent in enforcing school rules and only 77 percent of teachers agreed that administrators were consistent in enforcing rules.[c] This variance indicates that educators' concerns about consistent student discipline do not always indicate concerns about the educators' personal safety.

Student Behavioral Violations

> Behavioral violations can be either law violations or board violations. Harassment was the most common board violation. The most common law violations involved possession of marijuana or alcohol.

The Kentucky Department of Education organizes behavior data into two major categories: board violations[d] and law violations.[e] The most common board violation was harassment, and the most common law violation was possession of marijuana or alcohol. In the 2014-2015 school year, there were 29,672 total board violations and 6,194 total law violations. Beginning with the

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[c] This finding differs from the *Indicators of School Crime and Safety* report findings. The difference could possibly be due to the populations sampled by the two surveys. TELL samples educators from all grade levels, and the *Indicators of School Crime and Safety* report survey samples only high school teachers.
[d] An infraction of school rules that does not violate the law but is against the local board of education policy and requires a consequence/resolution.
[e] An infraction of school rules that also violates the law and could result in a call to the police, arrest, or charges filed (if the school chooses to pursue charges).

2012-2013 school year, KDE added additional reporting requirements for board violations. Before 2012, KDE required only violations resulting in out-of-school suspension, expulsion, or corporal punishment to be reported. Consequently, more board violations were reported in 2014 and 2015 than in 2013.

Board Violations

Board violations include bullying, harassment, and possession of tobacco and look-alike drugs. Board violations, mostly occurring in the classroom, have been increasing.

Board violations cover both bullying and harassment violations, as well as possession of tobacco and drug look-alikes. Board violations have been increasing over the past 2 years, increasing 56 percent, from 19,043 to 29,672, since 2013. More than 70 percent of board violations occurred in the classroom. The next most common location was the hallway or stairwell, with 7 percent of total violations occurring in one of these two locations. Violations coded as bullying have decreased slightly from 2013 to 2015. Harassment violations increased from 5,921 in 2013 to 7,512 in 2015. Figure 3.D shows the trends below.

Figure 3.D
Board Violations
School Year 2013 To School Year 2015
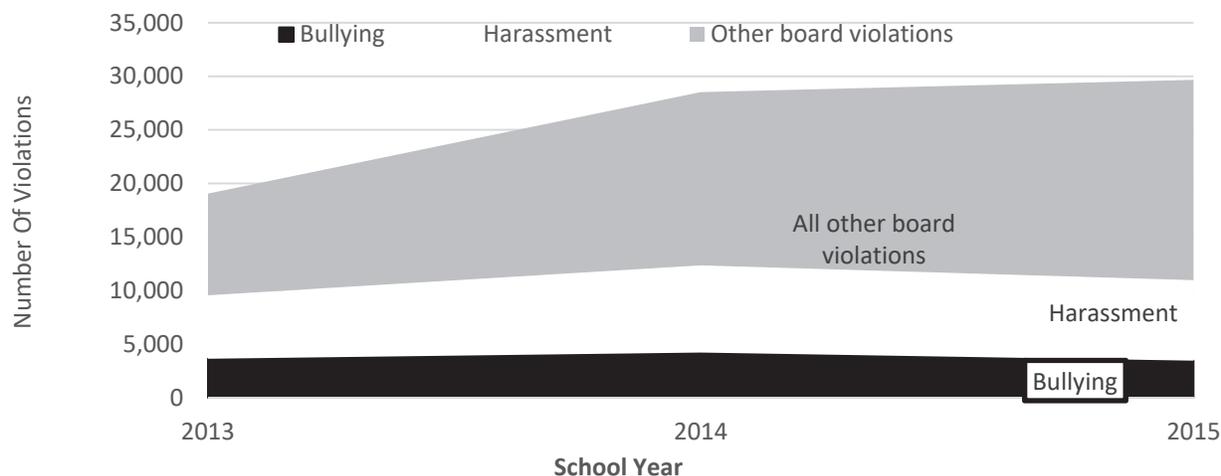
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Incident rates for special education students have increased more than incident rates for non-special education students.

Special Education Status, Race, Socioeconomic Status, And Gender. Figure 3.E displays the incident rate for board violations by special education status, race, socioeconomic status, and gender. The incident rate for special education students increased over the examined time period. In 2013, there were approximately 423 board violations per 10,000 special education students enrolled; in 2015, this had increased to 862 board violations committed per 10,000 special education students enrolled. The number of violations committed by non-special education students

also increased during the 2 years, but by a smaller amount, from 272 violations per 10,000 students enrolled to 388 violations per 10,000 students enrolled.

Based on enrollment, black students commit more violations than nonblack students, free and reduced-price lunch (FRPL) students commit more than non-FRPL students, and males commit more than females.

With regard to race, black students are committing 941 violations per 10,000 students enrolled; white students, the next highest group, commit 407 violations per 10,000 students enrolled. Other[f] students and Hispanic/Latino students follow at 360 and 257 violations per 10,000 students enrolled, respectively.

FRPL students were more than twice as likely to commit a violation, based on enrollment. FRPL students committed 596 violations per 10,000 students enrolled, compared to 237 violations per 10,000 non-FRPL students enrolled.

Additionally, males commit more than three times as many board violations as females; males are responsible for 682 violations per 10,000 students enrolled compared to 211 violations per 10,000 students enrolled for females.

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[f] "Other" includes American Indian/Alaska Native, Asian, Native Hawaiian/Pacific Islander, and two or more races.

Figure 3.E
Board Violations By Special Education Status, Race, Socioeconomic Status, And Gender
School Year 2013 To School Year 2015
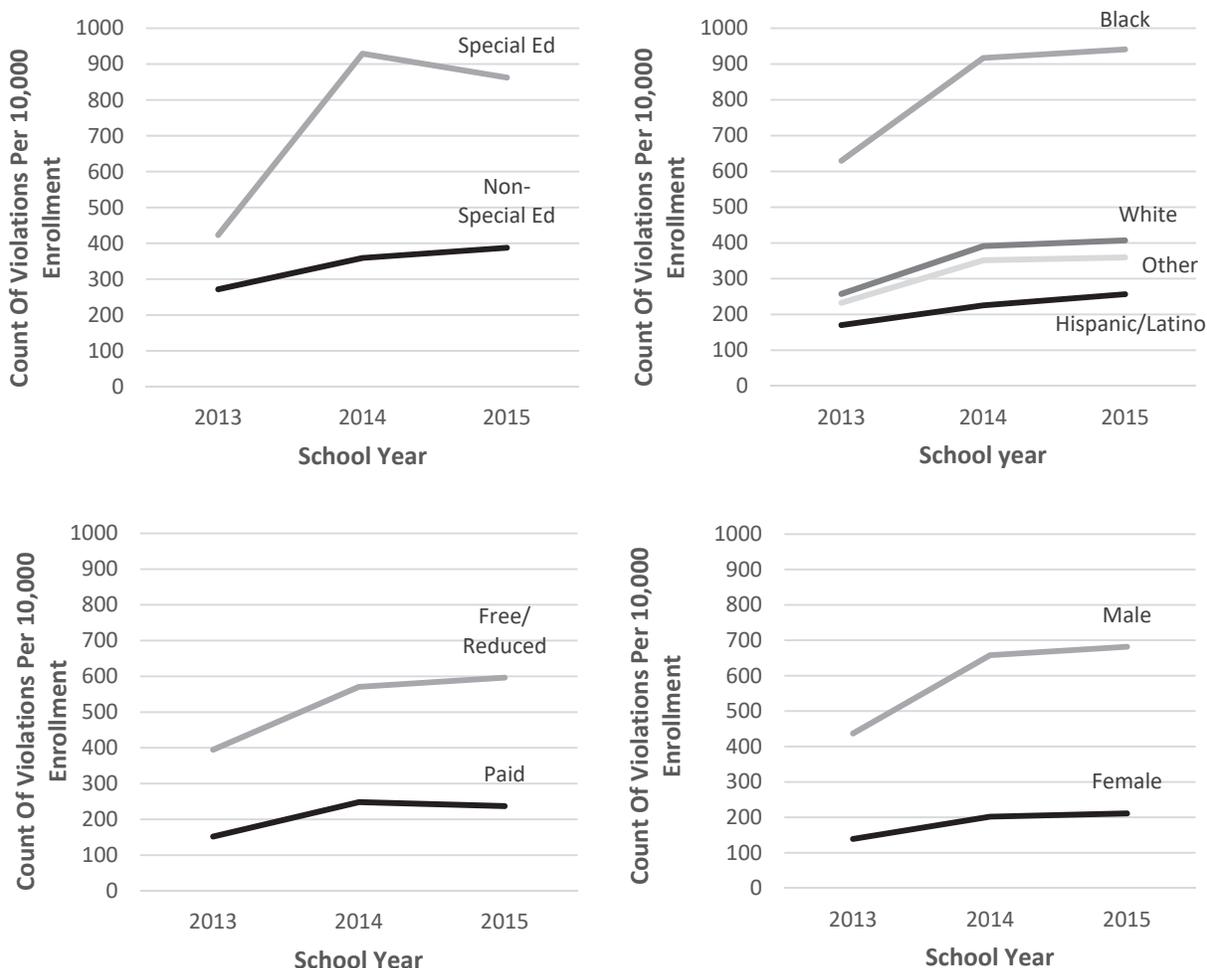
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education and SEEK Exceptional Child Counts.

Violations per grade increase each year until 9th grade, after which the number of violations begins to decrease.

Grade Level. As seen in Figure 3.F, over the previous 3 years, board violations by grade level have similarly trended higher. In all 3 years examined, 9th-grade students were responsible for the largest number of board violations. Leading up to the 9th grade, the number of violations grew every year, with the largest jump between 5th and 6th grade. After the 9th grade, violations started to decrease. This pattern was observable in all 3 years, with a significant increase starting in 2014. This was likely due to the changes in reporting requirements mentioned previously. Elementary schools averaged about 7 board violations per school, middle schools averaged approximately 24 board violations per school, and high schools averaged approximately 50 board violations per school, as seen in Figure 3.F.

Figure 3.F
Board Violations By Grade
School Year 2013 To School Year 2015
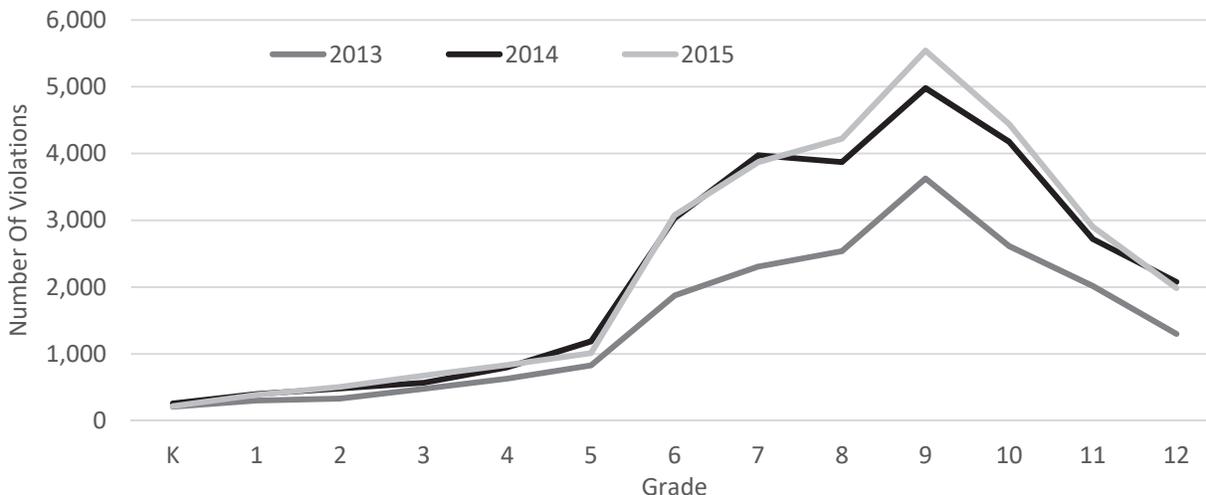
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Nearly 300 schools had no board
violation in the 2015 school year.
Of those schools, 180 were
elementary schools.

School Enrollment.[g] Figure 3.G shows the distribution of schools based on the number of board violations per 1,000 students in 2015. Nearly 300 schools had no board violations in the 2014-2015 school year. On the other end of the spectrum, nearly 200 schools had more than 100 incidents per 1,000 students. Of the 195 schools with more than 100 violations per 1,000 students, 130 are A1 schools, 3 are A3[h] schools, 46 are A5[i] schools, and 16 are A6[j] schools. The average for all schools across the state is 73 board violations per 1,000 students. Of the 290 schools with 0 board violations in the 2014-2015 school year, 15 were pre-K-only elementary schools, 180 were elementary schools, 4 were middle schools, 89 were A5 or A6 schools,[k] and 2 were A3 or D1[l] schools.

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[g]For the purposes of this report, enrollment refers to all student enrollments minus all withdrawals for entry level primary (K) through grade 12 students on the last day of the reporting period, as reported to the Kentucky Department of Education by the local superintendent at close of year via the Superintendent's Annual Attendance Report.
[h] An A3 school is a district-operated, totally special education program.
[i] An A5 school is an alternative program that is a district-operated and district-controlled facility with no definable attendance boundaries that is designed to provide services to at-risk populations with unique needs.
[j] An A6 school is district-operated instructional program in a non-district-operated institution or school.
[k] A5 and A6 designations are used for programs as well as schools. If a program is operated within an existing school, the violations are attributed to the school not the alternative program.
[l] D1 programs are state-operated schools.

There were no A1 high schools with 0 board violations in the 2014-2015 school year.

Figure 3.G
Board Violations Per 1,000 Students, School Year 2015
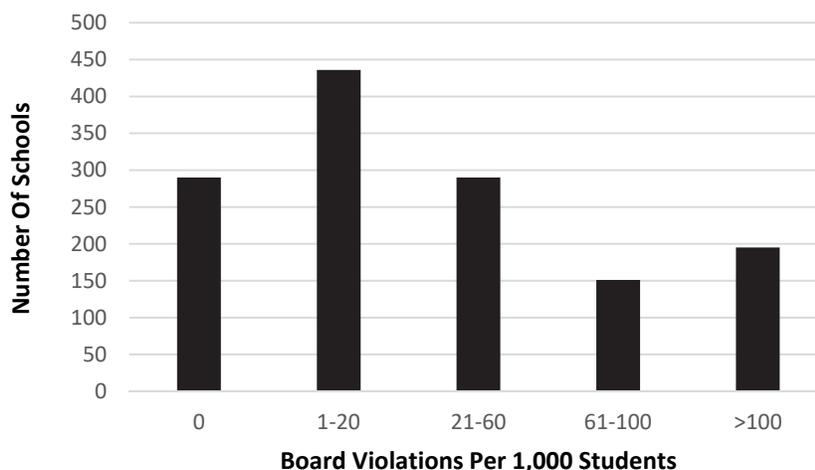
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Law Violations

Law violations represent legal issues, including drugs and assault. There were more than 6,000 law violations per year from 2013-2015.

Law violations represent legal issues, such as drugs and assault. Law violations remained more consistent over the examined time frame. In 2013 there were 6,102 law violations, increasing to 6,354 in 2014, and dropping to 6,194 in 2015.

Based on enrollment, special education students, black students, students on FRPL, and males commit more law violations than others.

Special Education Status, Race, Socioeconomic Status, And Gender. In 2013, special education and non-special education students were nearly identical in incidents per 10,000 students. Beginning in 2014, law violations committed by special education students increased dramatically compared to their non-special education peers.

Black students were responsible for 28 percent of the law violations in the 2014-2015 school year. This is a slightly larger percentage compared to board violations (22 percent), and still significantly larger than the black students' population (11 percent). White students were responsible for 71 percent of board violations, and 63 percent of law violations, well under the 79 percent of population represented. As seen in Figure 3.H, black students committed 252 law violations per 10,000 enrollment in 2015, while all other students committed between 75-80 violations per 10,000 enrolled.

FRPL students were approximately twice as likely to commit a law violation over the 3 years examined, and this rate was consistent every year. Much like board violations, males were responsible for approximately 75 percent of total law violations over the 3-year period. Similar to board violations, the majority of law violations occurred in the classroom (64 percent).

Figure 3.H
Law Violations By Special Education Status, Race, Socioeconomic Status And Gender
School Year 2013 To School Year 2015
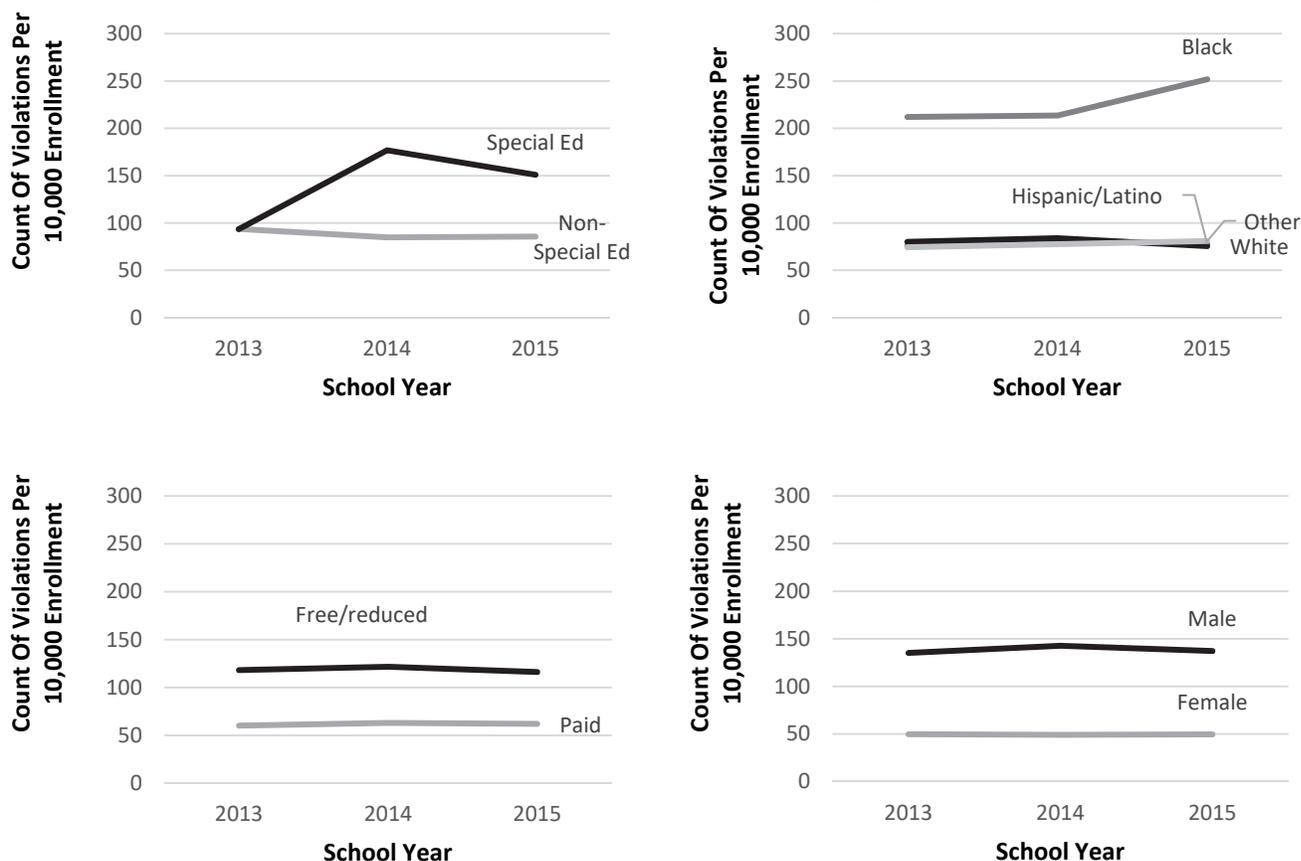
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education and SEEK Exceptional Child Counts.

Much like board violations, the number of law violations peaks in 9th grade.

Grade Level. As seen in Figure 3.I, law violations peak in 9th grade and decrease after that, a pattern similar to the trend seen in board violations. With board violations, a large increase was seen in the number of violations between elementary and middle school; however, the increase was not as pronounced for law violations. Compared to board violations, there was a larger increase in the number of law violations from 8th to 9th grade. The

number of law violations increased nearly 80 percent from middle to high school.

Figure 3.I
Law Violations by Grade
School Year 2013 To School Year 2015
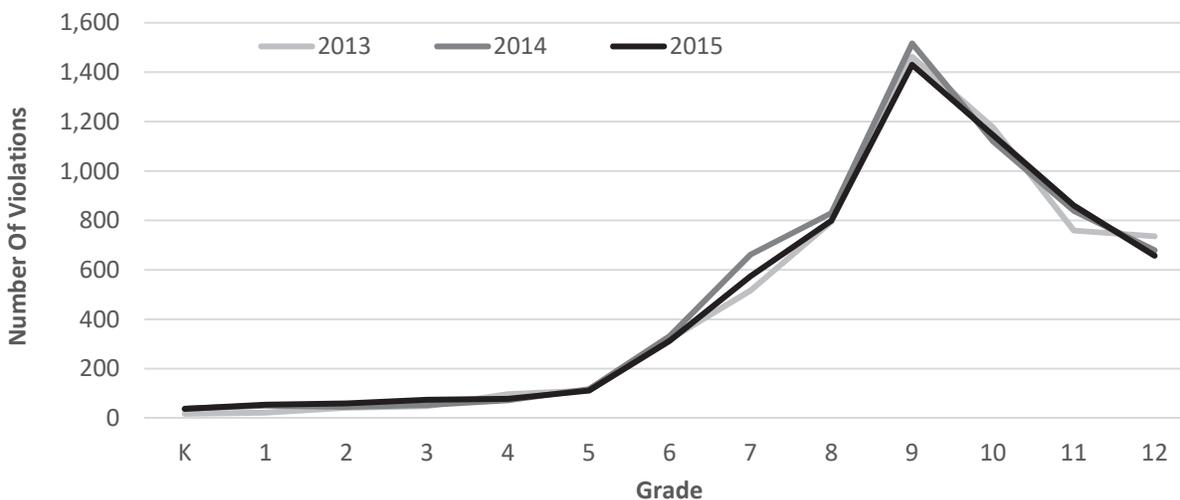
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Most schools had 0 law violations in the 2015 school year; most of these with 0 law violations were elementary schools.

School Enrollment. As seen in Figure 3.J, the majority of schools had 0 law violations during the 2014-2015 school year. Sixty schools had 60 or more law violations per 1,000 students. Of these 60 schools, 24 were classified as A1, 29 as A5, and 7 as A6. Of the 776 schools with 0 violations, 26 were pre-K-only elementary schools, 554 were elementary schools, 48 were middle schools, 23 were high schools, 120 were alternative schools,[m] and 5 were A3 or D1 schools.

[m] A5 and A6 denote programs as well as schools. If a program is operated within an existing school, the violations are attributed to the school and not to the alternative program.

Figure 3.J
Law Violations Per 1,000 Students
School Year 2015
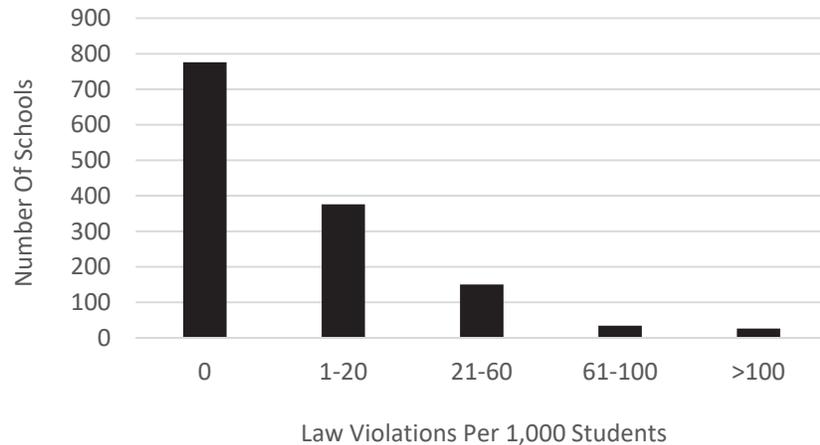
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Resolutions By Offense

There were more than 7,000 blank resolution codes for board violations during the 2014-2015 school year. Approximately 5 percent of these should have been reported as In-School Removal.

Blank Resolution Codes. OEA staff noted that 7,384 Safe Schools reportable board violations were not linked to a state resolution code in the 2014-2015 school year. This lapse will not be an issue for reporting purposes in the 2016-2017 school year because this field is now required in IC. Staff reviewed the comments from IC records to report the different types of resolutions that were not accounted for. KDE directs the recording of In-School Removal as follows:

> In-School Removal (INSR): A removal from the student's regular educational setting during instructional time and placement in a program or another setting within the district with the student continuing to receive educational and IEP-related services (i.e., In-School Alternative Placement, In-School Suspension, Safe Room, In-School Detention, Alternative Classroom, or Alternative Education Program within the district).

Pursuant to these instructions, some of these codes, such as an alternative placement school resolution code, should have been linked to the state resolution code of In-School Removal. There were 365 records, or 5 percent, that should have been coded to the state resolution code of In-School Removal and were not.

Twenty percent, or 1,509, of the blank records were coded to detention. Several schools gave students detention before and after school, as well as Saturday detention. Based on the definition above, these records would not be recorded as In-School Removal because the student was not removed from the regular classroom. Table 3.1 displays an analysis of the blank resolution codes and what the codes were used for.

Table 3.1
Blank Resolution Code Analysis, School Year 2014 To School Year 2015

Type Of Comment Associated With Blank Resolution Code	Count	Percent
Detention	1,509	20%
Conference	1,445	20
Notify parent	959	13
Warning	667	9
Alt placement/classroom	365	5
Bus suspension	304	4
Counselor/social worker/Family Resource Youth Service Center	301	4
Constructive assignment	231	3
Loss of privileges	231	3
Behavior contract/plan	130	2
Contact authorities or court-designated worker	80	1
Mediation	71	1
Loss of recess	68	1
Other	526	7
Null	497	7
Total	7,384	100%

Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

There were 304 records of students being suspended from transportation by the district's bus service. Another 1,445 resolutions, or 20 percent, included the principal or someone at the district having a conference with the student or parent. Additionally, 13 percent of blank resolutions were for simply contacting a student's parents.

Some groupings had too few observations to analyze separately and are reflected in the "Other" field. These include resolutions such as assigned seating, demerit given to student, other administrative decision, and other actions taken such that OEA staff could not determine a resolution code. Seven percent, or 526, of the blank resolutions were coded as other. Another 497 records were blank in the resolution type.

OEA analyzed the following resolution codes associated with both law and board violations:
- In-School Removal
- Expelled with Services
- Expelled without Services
- Out-of-School Suspension
- Corporal Punishment
- Restraint
- Seclusion
- None/Other (See blank resolution code section above)

Because relatively few resolutions were observed, OEA grouped corporal punishment, restraint, and seclusion resolutions together.

Assault Or Violence. The law violations associated with assault and violence include
- Criminal Homicide
- Forcible Rape
- Robbery
- Kidnapping
- Arson
- Statutory Rape
- Sexual Assault
- 1st Degree Assault
- 2nd Degree Assault
- 3rd Degree Assault
- 4th Degree Assault
- Menacing
- Felony Wanton Endangerment
- Misdemeanor Wanton Endangerment
- Felony Criminal Abuse
- Misdemeanor Criminal Abuse
- Terroristic Threatening
- Terroristic Threatening- Bomb
- Terroristic Threatening- Chemical/Biological/Nuclear
- Felony Stalking

Figure 3.K shows that many of the assault and violence violations resulted in suspension.

Figure 3.K
Resolutions For Assault Or Violence
School Year 2013 To School Year 2015
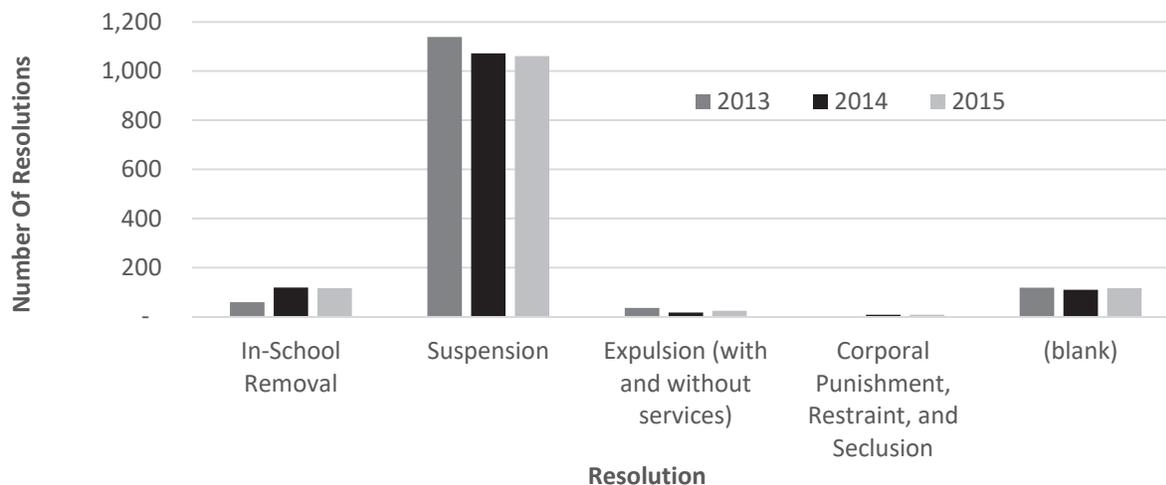
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

A majority of assault or violence incidents result in suspension. Black students are more likely to be suspended for assault or violence incidents compared to students of other races.

As seen in Table 3.2, black students are receiving suspension approximately 87 percent of the time for assault or violence violations, compared to 64 percent and 75 percent for Hispanic and white students, respectively. The table also compares suspension rates for FRPL and non-FRPL students within each race.

Table 3.2
Assault Or Violence Suspension Rates By Race
School Year 2015

Lunch Status	White	Black	Hispanic	Other Race
FRPL	73.7%	87.4%	---	80.0%
Non FRPL	80.4	88.1	---	64.3
Total	75.3	87.6	64.1%	76.6

Note: --- indicates redaction due to compliance with federal privacy laws.
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Weapons. Seen below are the violations associated with the weapons category:
- Weapon – Handgun
- Weapon – Rifle
- Weapon – Other Firearm (for example, air gun, BB gun)
- Weapon – Other (for example, knives, clubs, nunchakus, or other weapons that inflict severe bodily injury)

Most weapons violations result in students being suspended, though statute requires expulsion.

Figure 3.L shows the resolution outcomes associated with weapon violations. A large percentage of violations end with the student being suspended. Very few students are expelled for weapons violations.

Figure 3.L
Resolutions for Weapons
School Year 2013 To School Year 2015
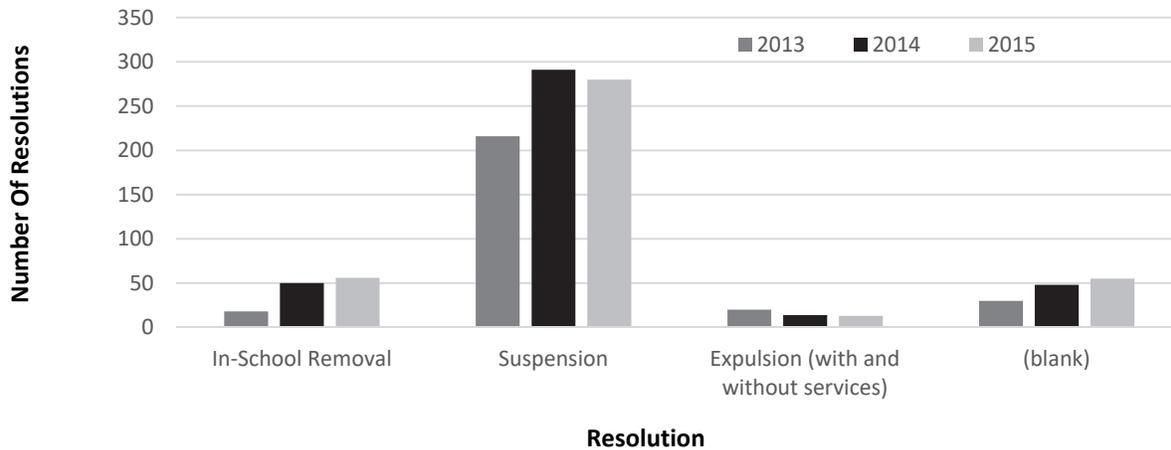
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

While the data show that students receive a variety of resolutions, KRS 158.150 mandates,

> Each local board of education shall adopt a policy requiring the expulsion from school for a period of not less than one (1) year for a student who is determined by the board to have brought a weapon to school under its jurisdiction. In determining whether a student has brought a weapon to school, a local board of education shall use the definition of "unlawful possession of a weapon on school property" stated in KRS 527.070.

Hispanic students who committed weapons violations were suspended at a higher rate than non-Hispanic students.

As seen in Table 3.3, Hispanic students are suspended at a higher rate than non-Hispanic students. White students are much more likely to receive an in-school removal compared to their peers. Black students have a higher likelihood of a blank resolution compared to their peers.

Table 3.3
Weapon Resolution By Race
School Year 2015

Race	In-school Removal	Suspension	Blank	Expulsion
White	16.0%	68.6%	12.8%	2.6%
Black	5.9	69.1	19.1	5.9
Hispanic/Latino	---	90.9	---	---
Other	7.7	69.2	15.4	7. 9

Note: --- indicates redaction due to compliance with federal privacy laws.
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Recommendation 3.1

KRS 158.150 requires expulsion from school for a student who is determined by the board to have brought a weapon to school. Based on statute and data provided, KDE may wish to further explore how KRS 158.150 is implemented by schools and local boards of education.

Drugs, Alcohol, Or Tobacco. The drugs, alcohol, or tobacco category contains both law violations and board violations. The violations are listed below:

- DUI
- Under Influence
- Look-alike drug possession, distribution
- Other Drug Possession/Use
- Other Drug Distribution
- Alcohol Possession/Use
- Alcohol Distribution
- Marijuana Possession/Use
- Marijuana Distribution
- Hallucinogenic Possession/Use
- Hallucinogenic Distribution
- Amphetamines Possession/Use
- Amphetamines Distribution
- Barbiturates Possession/Use
- Barbiturates Distribution
- Heroin Possession/Use
- Heroin Distribution
- Cocaine/Crack Possession/Use
- Cocaine/Crack Distribution
- Prescription Drugs Possession/Use
- Prescription Drugs Distribution
- Inhalant Possession/Use

- Inhalant Distribution
- Drugs (Special Ed only)
- Smoking (Tobacco)
- Chewing (Tobacco)
- Other (Tobacco)
- Alternative Nicotine Product (Tobacco)
- Vapor Product (Tobacco)

While in-school removal is the most common resolution associated with drugs, alcohol, or tobacco, it is not the only punishment used.

Unlike the previous categories, the resolutions of these violations are much more varied, as seen in Figure 3.M. This difference is likely due to the variety of infractions within the category. For example, tobacco and cocaine distribution greatly differ in legal status and severity. In-school removal is the most frequent punishment attributed to this category.

Figure 3.M
Resolutions For Drugs, Alcohol, Or Tobacco
School Year 2013 To School Year 2015
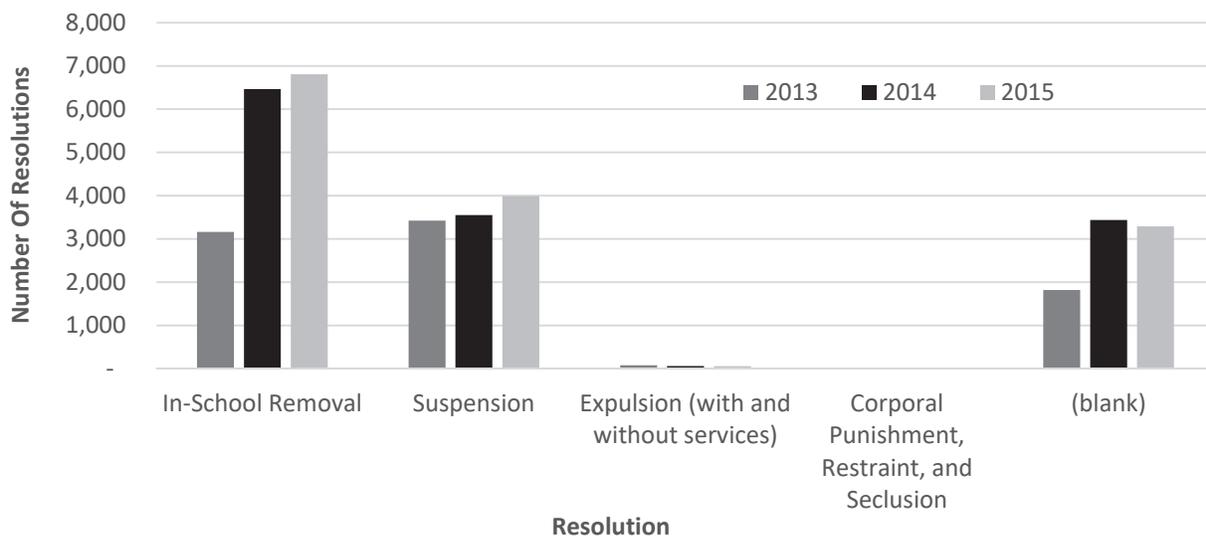
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

For law drug violations, white students are less likely to receive a suspension than black or Hispanic students. FRPL students are less likely to receive a suspension than non-FRPL students.

Table 3.4 breaks down the drug violations category further into law drug violations (including and excluding alcohol violations) and board drug violations. As mentioned earlier, board drug violations involve tobacco- and drug-look-alike-related violations. Further examination of law drug violations reveals that white students are less likely to receive a suspension compared to their Hispanic/Latino and black peers. Hispanic/Latino and Other race FRPL students are less likely to receive a suspension compared to non-FRPL students. Additional analysis was done removing alcohol possession/use and distribution from the other law

violations without varying the results. Black students are more likely to use marijuana compared to their peers and are more likely to receive a suspension for marijuana violations; however, white and Hispanic/Latino students are more likely to use and receive a suspension for alcohol violations. When examining board drug violations, tobacco and look-alike drugs, black students are approximately 5 percent more likely to receive a suspension compared to their peers.

Table 3.4
Suspension Rates For Drug Violations
By Race And Lunch Status
School Year 2015

Suspension For Law Drug Violations				
Lunch Status	**White**	**Black**	**Hispanic**	**Other**
FRPL	79.1%	87.9%	82.5%	77.8%
Non-FRPL	78.9	88.8	93.3	91.9
Total	79.1	88.1	85.2	82.6
Suspension Rates For Law Drug Violations, Excluding Alcohol				
Lunch Status	**White**	**Black**	**Hispanic**	**Other**
FRPL	78.8%	88.9%	82.1%	73.3%
Non-FRPL	79.6	90.2	94.9	93.3
Total	79.1	89.1	85.4	80.0
Suspension Rates For Board Drug Violations				
Lunch Status	**White**	**Black**	**Hispanic**	**Other**
FRPL	13.8%	21.1%	14.9%	16.2%
Non-FRPL	11.1	17.7	18.8	11.5
Total	13.2	20.5	15.5	15.6

Note: FRPL = free and reduced-price lunch.
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Bullying And Harassment. Violations included in the bullying and harassment category also include the threatening of staff. The violations are
- Bullying
- Harassment
- Threatening Staff
- Verbal Abuse
- Threatening Another Student
- Misdemeanor Stalking
- Harassing Communications

Resolutions for bullying and harassment are split fairly evenly among in-school removal, suspension, and blank.

Figure 3.N shows that the resolutions of bullying and harassment violations are quite varied. The totals are fairly evenly split between in-school removal, suspension, and blank.

Figure 3.N
Resolutions For Bullying Or Harassment
School Year 2013 To School Year 2015
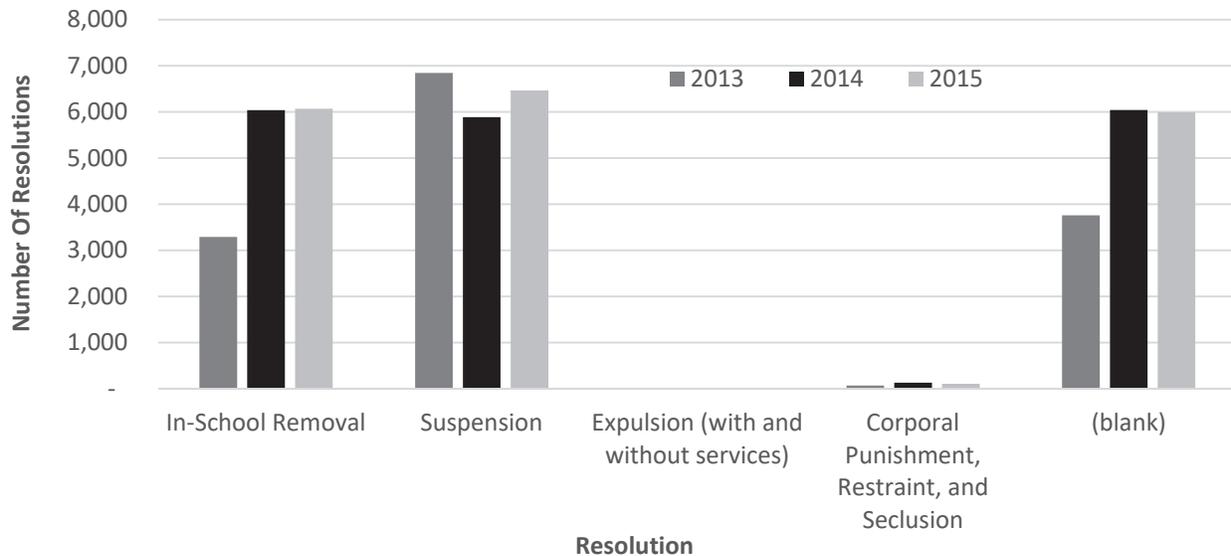
Source: Staff analysis of Safe Schools Data reported by Kentucky Department of Education.

Black students are much more likely to receive a suspension for bullying and harassment than other groups are.

Table 3.5 shows that black students are substantially more likely to receive a suspension compared to their peers for bullying and harassment board and law violations. All of the other races compared are similar to one another in regard to punishment.

Table 3.5
Bullying And Harassment Suspension Rates
By Race And Lunch Status
School Year 2015

Lunch Status	White	Black	Hispanic	Other
FRPL	29.88%	45.36%	25.53%	27.68%
Non FRPL	27.90	52.15	39.80	19.08
Total	29.40	46.24	27.49	26.28

Source: Staff analysis of Safe School Data reported by Kentucky Department of Education.

Recommendation 3.2

Recommendation 3.2

KDE should consider visiting schools with very high or very disproportionate rates of violations, suspensions, and expulsions to understand the factors contributing to these rates.

Chapter 4

Programs Of Distinction
And Compliance With Safety Requirements

Introduction

This chapter discusses some strengths and weaknesses of Kentucky's efforts to ensure student and staff safety and provide a disruption-free learning environment. Ensuring safety and a school climate conducive to learning should not be separate missions but instead should be part of a comprehensive schoolwide strategy.

This chapter includes strengths and weaknesses in school safety efforts, exemplary practices, successes in the Positive Behavior Interventions and Supports (PBIS) System and the Olweus Bullying Prevention Program (OBPP), and issues and concerns found during OEA site visits.

Exemplary practices discussed in this chapter include alternative programs selected by KDE as programs of distinction, model SRO programs and best practices identified by KCSS, and the successes of two instructional strategies for sustaining effective schoolwide disciplinary practices: the PBIS framework, and the Olweus Bullying Prevention Program (OBPP).

Challenges discussed in this chapter include issues and concerns voiced by district and school leadership during OEA site visits as well as findings from KCSS Safe School Assessments and OEA's site visits and agency interviews. Appendix D includes a list of concerns OEA staff found with statutes and district policies concerning school safety.

Exemplary Programs And Practices

Alternative Programs Of Distinction

Annually, KDE highlights exemplary alternative programs. Schools selected receive $3,000 and are featured in *Kentucky Teacher*, a publication distributed to all Kentucky public school teachers.

In 2009, KDE began highlighting exemplary A5 and A6 programs. The selection process has been revised and updated each year, but it always starts with school districts nominating their alternative programs for recognition. Once KDE personnel receive the nominations, KDE screens and scores the applications to determine which finalists will receive a site visit from educators with in-depth experience in alternative programs.

The 2016 Alternative Programs of Distinction process included an application consisting of 83 questions adapted from the AdvancEd Standards for Quality Schools. Each question in the application was scored on a four-point scale. A committee consisting of KDE

staff and external partners determined that 16 alternative programs would receive a follow-up site visit. From those site visits, the review team selected the following seven programs as Alternative Programs of Distinction:

- Bullitt Alternative Center, Bullitt County
- Transformational Learning Center, Covington Independent
- Regional School Programs, Dayton Independent
- The Learning Center at Linlee, Fayette County
- McCracken Regional School, McCracken County
- Western Day Treatment, Jefferson County
- The McDaniel Learning Center, Laurel County

Selected programs receive $2,000 from KDE and $1,000 from KCSS, are recognized at a Kentucky Board of Education meeting, and are featured in *Kentucky Teacher,* a publication that is distributed to all Kentucky public school teachers. The directors of the selected programs participate in a cadre that helps guide the decision-making process at KDE for other alternative programs throughout the state.

KCSS-Recognized Model School Resource Officer Programs

KCSS identifies model school resource officer programs in schools and districts. According to KCSS, 11 districts in Kentucky employ their own special law enforcement officers.

One of the goals of KCSS is to work with school districts and law enforcement officials to help implement, improve, and guide SRO programs across the state. KCSS' 2015 Annual Report estimated that there were 275 SROs during FY 2016, an increase of 12 from the prior year. Most SROs work full time and are assigned to more than one school in a district. The majority of SROs are assigned to middle schools and high schools.

While most school districts obtain SROs through a collaborative arrangement with their local law enforcement offices, 11 districts in Kentucky employ their own special law enforcement officers: Fayette, Jefferson, Clinton, Clark, Graves, Hickman, Montgomery, Morgan, Paducah Independent, McCracken, and Nicholas.

KCSS offered the following descriptions of exemplary SRO programs in the state:

- Calloway County High School was recognized for having an SRO who went above and beyond normal duties, even participating in driver education and participating with the administrative team charged with maintaining order in the school.

- The Boone County SRO program had an outstanding relationship between the local sheriff department and county schools, which shared the cost of the school safety director. The SROs are all retired law enforcement officers.
- The Clay County SRO has been heavily involved in the schools, meeting with parents, sitting in on special education students' admissions and release committees, accompanying field trips, and assisting with monthly safety inspections at each school.
- Erlanger-Elsmere Independent School District has made the SRO a part of the school's leadership team. The SRO has been vital in providing a trusted adult for students. The city of Erlanger covers the cost of the SRO.
- The Pulaski County SRO has implemented a website for online programs to develop self-esteem, leadership, and citizenship skills in both students and teachers.

Exemplary Practices Identified By School Safety Assessors

OEA asked KCSS staff to identify exemplary practices observed during assessments. KCSS identified 14 schools or districts excelling in their commitment to safety.

KCSS assessors have visited many schools to evaluate school safety and to provide safety training. During these visits, assessors have noticed some exemplary practices related to safety, such as emergency drills, physical plant safety, nursing, and SRO programs. OEA staff asked KCSS assessors to provide examples along with a list of the schools they have visited. KCSS staff identified 14 schools or districts excelling in their commitment to safety. Appendix C provides a complete list of KCSS-identified exemplary practices. Some of the highlights include:

- A high school reported that 87 percent of students have a trusted adult in their building. This is exemplary because most high school students do not feel they have an adult they trust in their building. Such a high level of trust is usually found only in elementary schools.
- An alternative school has weekly psychiatrist visits.
- A high school hosts a medical and mental health clinic that is open daily to students, staff, and parents.
- A school has panic buttons in the office and radios with direct contact to 911 dispatch.

Emergency Drills, Documentation, And Training

Every school visited by OEA had documents for emergency drills completed, up-to-date asbestos plans, and documentation for transportation inspections.

OEA site visits found schools and districts to be compliant in several areas. Evidence gathered by OEA indicated compliance with required drills, including performing drills on time. Every school visited had correct documents for every drill completed,

up-to-date asbestos plans, and documentation of transportation inspections. All school volunteers received a state background check and orientation materials before contact with students. All districts ensured that staff received annual training on required topics.

Safety Tip-Line, Online Prevention

KCSS provides an online tip line available to all districts free of charge that sends notification to the districts about reported issues.

KCSS provides a free email tip line that is available to all districts and schools. The Safety Tip-Line, Online Prevention is designed for students, parents, staff, and members of the community to report unsafe situations, while remaining anonymous if they choose. After submission of the tip, KCSS sends an email to the superintendent, or superintendent's designee, at the district. The school district can then investigate these situations to determine the approach needed to resolve the issue. Sixty schools use this service. Two of the seven districts OEA visited were using a different, but similar, service.

Positive Behavior Interventions And Supports

KDE supports the use of PBIS for a positive school climate and culture. The Kentucky Center for Instructional Discipline (KYCID) offers professional development to school and district officials, as well as identifies schools implementing PBIS with fidelity.

KDE supports the use of PBIS to support positive school climate and culture. KYCID offers free PBIS training to schools and districts. KYCID's mission is to train and support schools in the implementation of positive, proactive, and instructional strategies so that students become self-disciplined, responsible, and productive members of their community and the Commonwealth of Kentucky. KYCID offers administrators professional development throughout the year.

KYCID annually identifies schools that implement PBIS with fidelity. To reach fidelity, schools must complete a team implementation checklist with 80 percent of the elements fully implemented, a self-assessment, and a Benchmarks of Quality survey score of 70 percent. In addition, they must submit a year-end data report to KYCID.

In 2015, KYCID identified 210 schools that reached fidelity. More than 120 of these school are elementary schools.

There was a 3.5 percent increase in the total number of schools recognized for fidelity of implementation in 2014-2015. Of those 210 schools, 51 had not been recognized in 2013-2014, and 44 schools recognized in 2013-14 were not recognized in 2014-2015. In summary, 78 percent of schools recognized in 2013-2014 were also recognized in 2014-2015.

As Table 4.1 shows, elementary schools (18 percent) are more likely than middle (13 percent) and high schools (11 percent) to be implementing PBIS with fidelity.

Table 4.1
Schools Reaching PBIS Fidelity Status, School Year 2015

School Level	Number Reaching Fidelity	Number In State	Percent Reaching Fidelity
Elementary	127	712	18%
Middle	43	327	13
High	25	228	11

Source: Staff analysis of KYCID's 2014-2015 Fidelity List and KDE Open House data.

Bullying Prevention Training

KDE also offers training in OBPP with two certified trainers. KDE trained staff at one middle school in the 2016 school year and eight more during the summer of 2016.

In addition to the work KYCID does with PBIS, KDE offers training on OBPP. This approach is designed to prevent and reduce bullying in schools by using evidence-based training, consultation, and continuous 2-year follow up to create a positive and safe school climate. KDE has two OBPP-certified trainers. During the 2015-2016 school year, KDE trained staff members from one middle school. During the summer of 2016, eight more schools were trained on OBPP.

District- And School-Level Issues And Challenges

Issues Identified In OEA Site Visits

While schools and districts were compliant with most school safety requirements, there were issues where they failed to follow statute or guidelines.

While schools and districts were in compliance with drills and training, some areas of noncompliance were observed. The major findings are listed below.

- Some schools did not post evacuation routes that have secondary routes in each room. Some schools did not have weather safe zones.
- Some schools' Consolidated School Improvement Plans (CSIPs) did not address safety and student discipline.
- Some districts did not have district hazard communication plans that included personal protective equipment training.
- Some schools did not meet board policy requirements to provide playground inspection reports to the superintendent.

- Some districts lacked an overall safety plan. Most districts had many different pieces but not an overall plan. Some plans did not include long-term safety strategies by the board, and some districts did not have a community member on the safety committee.

Data management practices vary among schools, possibly compromising validity. Additionally, schools use a variety of methods to collect and maintain their Safe Schools Data. Of the 11 schools visited by OEA, 3 had records matching Infinite Campus (IC).

Student Discipline Data. The accuracy and completeness of student discipline data is sometimes compromised by schools' data management practices and inconsistent interpretations of how to categorize student behaviors and their consequences.

Schools use a variety of methods for collecting and maintaining student discipline data. When schools refer students for disciplinary action, OEA observed them using paper copies, IC, SWIS,[a] email, and Google Docs. For records, OEA saw mostly paper copies. Several schools used the SWIS application to input and analyze the school's data to present disciplinary trends to teachers during monthly meetings.

OEA staff sampled discipline referral records and compared them to behavior violations reported in Infinite Campus. Only 3 of the 11 schools had records that exactly matched data in IC. Some of the most common issues between IC and paper or SWIS records were nonmatching dates and times, nonmatching behaviors, siblings listed instead of the students who actually violated rules, and records completely missing from IC. OEA was unable to verify which system was correct. Of most concern is that records missing from IC are not reflected in the statutorily mandated reports. In addition, schools may be getting incorrect feedback about disciplinary trends.

None of the schools with correct records were using SWIS. Some discrepancies may arise from the duplicated effort of entering data into both IC and SWIS; often, different personnel enter data into each system. In addition to the added time and potential for error arising from this double keying of information, different personnel may have different interpretations of behavior and resolution codes. If data could be entered just once, the staff time saved by not entering data a second time could be used for more verification of data accuracy.

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[a] SWIS, a purchased program, is most often used in alignment with the PBIS framework.

Recommendation 4.1

KDE should consider writing ad hoc reports in Infinite Campus that mirror the SWIS reports. This would avoid double keying, thereby saving time, increasing accuracy, and making IC reports more accessible for review on a regular basis. It could also save districts money if they choose not to use SWIS.

While schools have experienced some difficulty in receiving student records from IC, most attributed the delays to personnel, as opposed to technical issues.

Student IC Record Transfers. Members of EAARS specifically requested that OEA investigate schools' experiences with IC's ability to transfer student records. During site visits, responses were varied. Most of the smaller districts indicated a fairly cordial relationship with surrounding districts, allowing them to pick up the phone for consultation if an issue arose. Others expressed difficulty in receiving records from larger districts; however, some mentioned smaller districts' lack of staff as a hurdle. While experiences varied, most obstacles appeared to be personnel issues as opposed to technical issues. KDE is currently working on documentation that outlines the transfer of records process and that will include special education and discipline records.

OEA observed various discipline guidelines among schools, including those in the same district. According to statute, there should be a districtwide code of acceptable conduct.

Discipline Guidelines. OEA noted various discipline guidelines, even among schools within the same district. KRS 158.148 requires local boards of education to adopt district codes of acceptable behavior and discipline; the behaviors and consequences listed in these codes of conduct are often broadly defined.

SBDM councils are responsible for selecting discipline and classroom management techniques; often, the SBDM council's decisions are summarized in the student handbook as a matrix of behaviors and consequences, which may not match the district's code of acceptable behavior and discipline. For example:

- A district code specified four levels of discipline events and resolutions, but a school within that district specified only three.
- A district code considered bullying a level-one discipline event with no in-school suspension, but a school within that district prescribed in-school suspension for bullying.
- A district code prescribed expulsion for some infractions but the school's discipline grids had no expulsions listed as a consequence.

Other issues identified through the review of district codes of conduct included the following:

- In student handbooks, consequences for infractions varied from being very specific to being an "administrative decision" left open to the discretion of the principal. This inconsistency could allow substantially different consequences for the same infraction.
- Several codes did not have procedures for identifying, documenting and reporting incidents of bullying. Some codes merely referred the reader to the board policy.
- Most district codes had no procedures for investigating bullying.
- Most district codes prohibited retaliation against students who report bullying but did not have a strategy or method of protecting students from retaliation.
- Although each school is required to post the district codes, many did not, and most codes that were posted on the district's website were not the most recent version.
- One site visit district had not updated its code of acceptable behavior and discipline since 2007. KRS 158.148 requires that codes be updated every 2 years.

The General Assembly may wish to consider whether consequences for violations should differ between or within districts.

Recommendation 4.2

| **Recommendation 4.2** |

Clarification is needed to determine whether schools may institute codes of acceptable behavior and discipline that differ from their district's code of acceptable behavior and discipline.

Nearly every school visited during site visits had at least minor cyberbullying incidents. Officials expressed difficulty in handling situations because most cyberbullying incidents occur outside of school.

Cyberbullying. Nearly every school visited had at least minor issues dealing with cyberbullying.[b] Because the majority of instances occurred while students were not in school, some administrators questioned whether it was within the school's jurisdiction to address these complaints; however, with the passage of SB 228 (2016), schools must intervene not only if bullying occurs on school premises or at school-sponsored events but also any time it disrupts the education process. Schools experiencing cyberbullying expressed concerns about the large time commitment required to investigate claims. Most agreed that social media made it harder to investigate.

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[b] *Cyberbullying* is not defined in Kentucky statutes, but federal agencies often refer to it as bullying through electronic media such as email, chat rooms, instant messaging, websites, or texting.

The majority of districts visited reported at least one bomb threat at a school in their district. The threats varied from written notes to writing on bathroom walls.

Bomb Threats. Five of the seven districts OEA visited reported that one or more of their schools had received a bomb threat. Threats varied from written notes, to writing on bathroom walls, to robotic calls. One administrator raised the concern that a would-be shooter might call in a bomb threat with the express purpose of having people leave the safety of the building and thereby make themselves vulnerable to the shooter.

Both school and district administrators expressed concern over the recent definition of *bullying.*

Bullying **Definition**. District administrators fear they are not properly trained to implement the requirements of the new definition of *bullying* passed in SB 228 and codified in KRS 158.148. They voiced particular concerns about the broadness and ambiguity of the phrases "perceived power imbalance" and "potential to be repeated" in KRS 158.148(1)(a).

School administrators were much less aware of the new bullying definition than of other matters discussed. Of those who were aware, many expressed hesitation. Much of the concern focused on the broad nature of the definition and the possibility for increased liability. Interviewees explained that schools are already struggling to educate students and parents on what bullying is, and they are concerned that this definition will only make things more difficult.

A majority of schools visited by OEA indicated concern over the new juvenile justice reforms. Concerns raised included student behavior, inability to address truancy, instability with foster children, and unsuccessful students considered a success.

Juvenile Justice Reforms In SB 200 (2014). In 2014, the Kentucky General Assembly passed SB 200, overhauling the juvenile justice system and amending or creating new duties for the Administrative Office of the Courts, the Department of Juvenile Justice, the Justice and Public Safety Cabinet, the Cabinet for Health and Family Services, KDE, court designated workers, county attorneys, District and Family Courts, SROs, school security officers, each local school, and directors of pupil personnel. During site visits, OEA staff inquired about implications of SB 200 for schools and districts.

A majority of schools indicated at least some concerns about the new law. Several schools indicated that SB 200 has increased the difficulty of handling student behavior issues. Interviewees stated that students are quickly becoming aware that it is unlikely they will see a judge and face possible court-ordered consequences and that this awareness empowers students to have little respect for school officials. One school official commented, "It takes longer to fill out paperwork than the kid gets punished." Schools stated that they have no recourse to address truancy issues. One district reported difficulty in being able to keep truant students in school; before SB 200, students could see a judge in September or October

for truancy, but now it is March or April before truant students appear in court, after most of the school year has been lost.

Another school expressed concerns that foster children face more instability because they are being sent from one foster home to another in order to comply with the time limit on staying at a given foster home.

Another concern was that students were not learning about rules and their consequences; upon reaching 18, these students may have a "rude awakening." Family, Accountability, Intervention and Response (FAIR) teams were established to work in collaboration with the Cabinet for Health and Family Services' Regional Interagency Councils to develop enhanced case management plans and service referrals for juveniles before youth are ever referred to court. One district director of pupil personnel, and member of the FAIR Team, remarked, "We have a known drug dealer, and the strongest action we can take is to recommend to the parent that they get their child drug-tested."

A few administrators expressed concerns about overstatements of completion rates for the diversion program created under SB 200. School administrators informed OEA staff of instances in which students were not successful in the program but were recorded as being successful anyway.

> Interviewees mentioned prescription drugs, illicit drugs, and synthetic marijuana as emerging issues in schools. Schools are facing issues with children whose families use drugs.

Substance Abuse And Mental Health Issues. Prescription drugs, illicit drugs, and synthetic marijuana were often mentioned as emerging issues. Schools are having trouble with children whose families use heroin and illicitly obtained pills, and some children were born to mothers who used heroin. Drugs are creating problems such as developmental issues and situations in which students lose family members to drugs or students must live with elderly grandparents. Older students are reportedly using more synthetic marijuana.

> Officials in some urban districts indicated that refugee students are creating difficulties for their districts. They report that many of these students are coming in with little education, if any.

Some urban districts expressed difficulty in accommodating an influx of refugees, many of whom have little or no education. If the district can determine a student's age, there is still difficulty in determining appropriate grade placement. This difficulty creates large discrepancies in abilities among children of the same age and therefore presents difficulties in choosing the proper placement for these children.

District officials report that mental health and behavioral issues are becoming growing concerns. Younger students are enrolling with severe issues, and many districts lack the qualified personnel necessary to deal with these issues.

The majority of visits found growing concerns with student mental health and behavioral issues. Increasingly, younger students enroll in school with severe issues. Many districts lack the qualified personnel to deal with these issues. Rural districts are isolated from the types of treatment professionals available in urban areas, and they lack the resources to attract treatment professionals to the area.

KCSS Safe School Assessment Findings

KCSS has conducted 841 Safe School Assessments within 166 districts since 1999. OEA reviewed 91 and found that the most common area of concern was inconsistent use of staff and visitor badges, supervision, bus behavior, and building accessibility.

One of KCSS' statutory duties is to evaluate school safety programs. KCSS accomplishes this goal by providing Safe School Assessments, which are voluntary and conducted upon a superintendent's request. Between FY 1999 and the end of FY 2016, 166 districts had taken advantage of this service. To date, KCSS has conducted 841 Safe School Assessments and has already filled all available slots for 2017 Safe School Assessments.

OEA staff reviewed 91 Safe School Assessments (40 elementary, 22 middle and 29 high schools) completed by KCSS between September 2014 and January 2016. This review was undertaken to evaluate the most common areas of concern noted in assessments.

As reflected in Table 4.2, the most common area of concern in the Safe School Assessments was the inconsistent use of staff and visitor badges. This concern was noted in 66 percent of the reports reviewed and was more common at high schools and elementary schools than at middle schools. According to KCSS, it is important for all staff and visitors to wear visible badges because
- it makes it easy for first responders to quickly recognize school employees;
- it allows visitors to know who can offer assistance, if needed; and
- school and district staff can direct visitors back to the office to follow correct sign-in procedures.

Table 4.2
School Safety Assessment Findings Of Concern

School Safety Assessment Findings	Elem	%	Middle	%	High	%	Total	%
Lack of staff/visitor badges or inconsistent use	28	70%	10	45%	22	76%	60	66%
Supervision issues between classes	16	40	15	68	25	86	56	62
Bus behavior	26	65	18	82	7	24	51	56
Supervision issues before and/or after school	15	38	12	55	23	79	50	55
Security and building accessibility	22	55	5	23	22	76	49	54
Supervision issues - lunch	14	35	13	59	18	62	45	49
Supervision issues - parking lot	10	25	11	50	24	83	45	49
Lack of consistency in enforcing rules	5	13	13	59	25	86	43	47
Emergency management/crisis response and parent reunification	11	28	14	64	17	59	42	46
Tobacco use and e-cigarettes	1	3	7	32	27	93	35	38
Bullying and harassment	4	10	9	41	15	52	28	31
Lack of emergency drills	9	23	5	23	11	38	25	27
Internet safety	11	28	3	14	10	34	24	26
Supervision issues - car rider dismissal	13	33	8	36	3	10	24	26
Need SRO	7	18	7	32	9	31	23	25
Supervision issues - playground	18	45	1	5	0	0	19	21
Drug or alcohol issues	0	0	0	0	14	48	14	15
Lack of evacuation floor plans	3	8	3	14	6	21	12	13
Lack of surveillance system	4	10	5	23	3	10	12	13
Theft	5	13	1	5	6	21	12	13
No hazard plan	1	3	0	0	9	31	10	11
No open container policy	0	0	1	5	9	31	10	11
Lack of signage in parking area	1	3	1	5	6	21	8	9
Building issues clutter/mold/graffiti	2	5	1	5	4	14	7	8
Need school nurse	3	8	0	0	4	14	7	8
Suicide prevention	1	3	3	14	3	10	7	8
Locking of classroom doors	2	5	2	9	2	7	6	7
Weapons	0	0	0	0	6	21	6	7
Bullying training	2	5	0	0	3	10	5	5
Lockdown initiation	1	3	1	5	2	7	4	4
Lack of consistency in discipline referrals	1	3	1	5	1	3	3	3
Lack of parking lot lighting	2	5	1	5	0	0	3	3
Fencing playground	2	5	0	0	0	0	2	2
Fighting	0	0	0	0	2	7	2	2
Lack of a trustworthy adult	0	0	1	5	1	3	2	2
Total	40		22		29		91	

Note: This table summarizes findings of 91 assessments conducted between September 2014 and January 2016.
Source: Staff analysis of KCSS School Safety Assessments.

The next most common area of concern across all grade levels was lack of supervision; lack of supervision during student class changes occurred in 62 percent of all assessments, and lack of supervision before and/or after school occurred in 55 percent of those assessments. Supervision issues during class changes were reported in 86 percent of all high schools assessed, 68 percent of all middle schools assessed, and 40 percent of all elementary schools assessed. Lack of supervision before and/or after school was more prominent in high schools (79 percent) than in middle schools (55 percent) and elementary schools (38 percent). KRS 161.180 addresses the supervision of pupils' conduct by teachers, administrators, and classified employees while students are on school premises, being transported to and from school, and at school-sponsored events. Because of this legal requirement, KCSS maintains that if an acceptable level of school safety is to be achieved, the supervision of pupils is fundamental and nonnegotiable.

Student behavior on buses was the third most common overall concern; however, these concerns varied greatly by school level. Most bus behavior issues involved middle school students. Bus behavior issues were identified in 82 percent of middle schools, 65 percent of elementary schools, and 24 percent of high schools. The lower incidence of bus issues in high school could be attributed to more students driving to school instead of riding the bus. KCSS suggestions to address this issue include

- reviewing bus rules with students and reminding students that riding the bus is a privilege,
- working with the district transportation director to determine whether drivers can share ideas or ride another driver's bus to observe effective strategies, and
- providing professional development for transportation staff (KCSS provides bus driver training at little or no cost).

Schools must maintain a welcoming school climate and at the same time secure school buildings from intruders. Security and building accessibility was the next most common concern, at 54 percent, among overall concerns for all grade levels. At the school level, school and building accessibility was an issue in 76 percent of high schools assessed, 55 percent of the elementary schools assessed, and 23 percent of the middle schools that were assessed. These are some of the issues that were noted:

- Schools using a buzzer system to allow access into a building without having interior security vestibules
- Students or staff propping open doors to outside entrances, which allowed reentry at any time

- Out-of-date, low-resolution exterior cameras, which result in difficulty viewing or recognizing people entering the buildings
- Office staff buzzing in visitors without asking their reasons for admission
- Exterior doors not closing automatically or closing slowly after being opened
- Not locking all doors that permit access into the school
- Lack of student monitoring during transitions between educational buildings at the high school level

There were also some findings that needed to be addressed at a single school level, but not at other levels. For example, tobacco use and e-cigarettes were issues at 93 percent of high schools, but at only 32 percent of middle and 3 percent of the elementary schools. Supervision issues on the playground, which was identified in 45 percent of elementary schools, were not present in high schools or most middle schools, as they generally do not have playgrounds.

Districts' Emergency Management Plan Assurances

Districts submit assurances with their Comprehensive District Improvement Plans to indicate compliance with emergency management plans. Districts' self-reported assurances indicated much higher compliance than KCSS assessments.

To ensure that districts and schools are in compliance with SB 8 and HB 354 on Emergency Management Plans (EMP), KDE added district and school assurances to the Consolidated District Improvement Plan (CDIP) and CSIP submission processes so that superintendents and principals indicate by signature that they are in compliance.

Districts' self-reported compliance seems to be much higher than what would be expected from the OEA site visits and KCSS Safe School Assessments, which were discussed earlier. KDE does not monitor CSIP responses and does not independently verify CDIP responses.

Table 4.3 shows for each assurance the number of districts that self-reported that they were not compliant. The most common areas of noncompliance reported by districts related to the failure of SBDM councils to adopt policies requiring the development and adoption of EMPs and the failure of those councils to actually adopt the EMPs.

Table 4.3
Districts' Self-Reports Of Non-Compliance
With Required Emergency Drills And Emergency Management Plans
School Year 2015

2015 CDIP District Assurance Question For Compliance With SB 8 And HB 354 Regarding Emergency Management Plan	Districts Out Of Compliance
Did each SBDM council adopt a policy requiring the development and adoption of an EMP?	18
Did each SBDM council adopt an EMP?	12
Has each school developed and adhered to practices designed to ensure control of access to the school (for instance, controlling access to exterior doors, front entrance, classrooms, requiring visitor sign-in, display of ID badges)?	1
Has each school provided local first responders with a copy of the school's EMP and a copy of the school's floor plan?	10
Has each school's EMP been reviewed and revised as needed by the SBDM council, principal, and first responders (annually)?	6
Have practices been developed in each school for students to follow during an earthquake?	1
In each school, are evacuation routes posted in each room at any doorway used for evacuation, with primary and secondary routes indicated?	4
Was each school's EMP reviewed with the faculty and staff prior to the first instructional day of the school year?	9
Were local law enforcement and/or fire officials invited to review each school's EMP?	6

Note: CDIP = Consolidated District Improvement Plan; SBDM = school-based decision-making; EMP = Emergency Management Plan.
Source: Kentucky Department of Education Guidance for SB 8/HB 354.

State-Level Issues And Challenges

KYCID Performance Of Duties

KDE was unable to provide OEA with a detailed scope of work for KYCID. It appears KYCID has not met several services and goals indicated in its memorandum of agreement.

Despite repeated requests, KDE was unable to provide OEA the detailed scope of work referenced in the KYCID MOA. It appears that KYCID has not addressed the following services and goals listed under the terms and conditions of the MOA:

- Develop new approaches to support activities emphasized by KDE.
- Hold quarterly meetings of stakeholders for PBIS from schools, agencies, and families.
- Publish the KY-PBIS newsletter four times each year.
- Roll out a new Tier Fidelity Inventory to replace other PBIS surveys in 20 percent of schools.

- Recognize schools for fidelity of implementation in using new criteria for PBIS.
- Review the strategy of acknowledging schools that reduced or maintained low office disciplinary referrals/suspensions at the end of the school year.
- Efficiently utilize Infinite Campus data to create discipline data reports on a monthly and annual basis including graphic display of data.
- Work with district PBIS leadership teams to improve data collection, analysis and reporting.

Compliance Monitoring And Enforcement

Although school safety statutes do not explicitly spell out responsibility for ensuring compliance, the general responsibilities of the commissioner of education outlined in KRS 156.010(1)(f) include

> [m]onitoring the management of school districts, including administration and finance, implementation of state laws and regulations, and student performance.

This monitoring function is normally, and appropriately, discharged through the use of designees.

Although districts can voluntarily ask KCSS for a safety assessment, no organization has the responsibility to follow up to make sure that deficiencies are corrected, and no organization conducts compliance audits on a nonvoluntary basis.

It may be argued that, as the organizations with regulatory authority over Kentucky's K-12 education system, the Kentucky Board of Education and KDE have the primary responsibility to ensure compliance. but they currently exercise a limited role. The state's main monitoring tool is a set of self-reported assurances by district superintendents that schools in their districts are compliant, but district superintendents do not have specialized safety knowledge and are not in each school on a daily basis. KCSS' school safety assessments and OEA's site visits found much lower levels of compliance than superintendents reported.

Recommendation 4.3

KDE should consider adding safety compliance measures to the Statewide Consolidated Monitoring Process.

Sidenote (left margin): Although statutes do not directly assign responsibility for ensuring compliance, the commissioner of education is likely responsible.

Sidenote (left margin): Although KCSS provides voluntary safety assessments, no organization has the responsibility for follow-up, nor does any organization conduct nonvoluntary assessments.

Sidenote (left margin): **Recommendation 4.3**

Overlapping Roles Of KCSS And KDE

During site visits, officials expressed satisfaction with the support offered by KCSS, but only a few were aware KDE has a safe schools contact.

Overall, KCSS and KDE make an abundance of information available to districts and schools on the topic of school safety. Both agencies have provided school safety training to local school district staff on various topics, such as building safety, dealing with angry people, staying safe while using social media, personal safety, and bullying. They both also provide phone support to district and school employees who need immediate guidance on school safety. During site visits, district and school officials reported being satisfied with the amount of support being offered by KCSS. Only a few interviewees were aware that KDE has a Safe Schools program coordinator.

Both KCSS and KDE provide annual safety reports as required by statute.

Both agencies provide annual school safety reports. KDE provides the *Safe School Annual Statistical Report,* which includes board behavioral incidents and resolutions by gender, race, and other characteristics. KDE stated that this report is generated to comply with KRS 158.444. KCSS provides the Annual Report referenced in KRS 158.442; this report includes information about the duties of KCSS and its partners, the Safe School Assessments process, SRO facts, and information about funding and expenditures from the Safe Schools Grant.

KDE Reporting

KDE reports fail to meet some of the statutory requirements. The required incidents in the reports are not sorted correctly, and the reports are often issued after the required date.

Reports that KDE submits to EAARS fail to meet some requirements of KRS 158.444. The *2014-15 Safe Schools Report* did not include the reportable incidents sorted by individual districts, by schools, and then by individual grades within each school. The reportable incidents were also not reported by month. Moreover, the report was provided after the August 31 deadline mandated by KRS 158.444. KDE stated to OEA that this deadline is not feasible. KDE stated that a more appropriate deadline would coincide with the release of the annual school report card in October of each year.

KDE has provided raw data to OEA each year in an attempt to satisfy the statutory requirements of KRS 158.444(3) to report to OEA. This raw data has been necessary and helpful for OEA's study; however, the provision of raw data falls short of meeting the requirements set out in statute. After OEA identified errors in the raw data, KDE indicated they had modified the data without notifying OEA of the modification.

KRS 158.444 directs KDE to establish and maintain a statewide data collection system by which school districts are to report a large array of data. KDE collects much of the data listed in this statute. One set of data not collected by KDE is mentioned in section (2)(b)(4) of the statute: data from district and school self-assessments required by KRS 158.445. KDE and KCSS interpret the wording of KRS 158.445 to mean that those self-assessments were required only once, in the 1998-1999 school year. It is unclear whether the General Assembly intended these self-assessments to be conducted only once or on an ongoing basis.

Recommendation 4.4

Recommendation 4.4

The General Assembly may consider revising KRS 158.442 through KRS 158.449 along with KRS 158.148, to avoid confusion and clarify the roles and responsibilities assigned to KDE, KCSS, districts, and schools.

KDE continues to work on statewide student discipline guidelines, as required by statute. The current guidelines were last modified in 2003. Additionally, several required components are missing from those guidelines.

Statewide Student Discipline Guidelines. KDE continues to work toward the statutory duties assigned in KRS 158.148. This statute requires KDE, in cooperation with several other education and community partners and along with members of IJCE, to update as needed the statewide student discipline guidelines. The guidelines posted on the KDE website as of August 22, 2016, are the original guidelines from 2003.

Several required components are missing from the guidelines. They are supposed to define *serious incidents*, but this definition is absent. They do not include any definition of *bullying*. KRS 158.148 requires that the guidelines include recommendations designed to improve the learning environment and school climate, and parental and community involvement in the schools. The guidelines do not include this content. The guidelines do not identify successful strategies currently being used in programs in Kentucky or in other states.

KCSS Duties

The KCSS annual report also fails to meet all of its statutorily defined requirements. In the past, the report has been completed after the required date and does not fully address information required by statute.

KCSS continues to work toward compliance with duties assigned under KRS 158.442. Specifically, section 2 requires that KCSS provide an annual report by July 1 on the status of school safety in Kentucky. KCSS occasionally has failed to meet this deadline.

The required content of the KCSS annual report is not specified in statute, and additional confusion may stem from the fact that KRS 158.444 directs KDE to produce school safety data. As

discussed earlier, the KCSS annual report discusses KCSS' overall duties and does not contain much on the status of school safety in Kentucky. The director of KCSS stated that a prior EAARS co-chair thought that the rest of the EAARS members would like to hear what activities the KCSS has been involved with over each year. Because this report includes fiscal information, it is virtually impossible for KCSS to produce this report by July 1, because the fiscal year ends on June 30, and the financial expenditures for both KCSS and districts would not be available in time to permit the preparation of the report.

The KCSS board of directors fails to recommend grants, as required by statute, as well as develop model interagency agreements for schools. KCSS does not have an attorney on staff for legal issues from schools and districts.

KRS 158.443 discusses the terms of the KCSS board members and their duties. Part of their duties is to approve an annual work plan, budget, operating policies, and recommendations for grants. The KCSS board is performing these duties with the exception of recommending grants. KRS 158.443 also calls for the board to develop model interagency agreements between local school districts and other local agencies, though OEA staff could find only one such agreement, which was from 1999.

Districts sometimes ask KCSS for advice that requires legal expertise, but KCSS does not have attorneys on staff.

Budget language requires KCSS to develop and implement allotment policies for all money received. KCSS has not adopted any allotment policies but has approved the distribution of funds with the same amount given to each district and the remaining funds distributed on a per-pupil basis. This method of distribution was not reflected in the board minutes for each year.

Safety Considerations For Construction And Renovation

Statute requires school construction and renovation to incorporate Crime Prevention Through Environmental Design principles. Although a checklist is available on KDE's website, no guidance is offered on its use.

KRS 158.447 requires local boards of education, with KDE supervision, to review Crime Prevention Through Environmental Design principles when constructing or renovating school buildings. KDE provides a checklist on its website but no guidance on the use of the checklist. Furthermore, the checklist is not incorporated into the Facility Programming and Construction Criteria or part of the Building and Grounds process.

Appendix A

Statutes Dealing With School Safety

Statute	Topic(s)
17.545	Prohibits sex offenders from trespassing on school grounds.
95.970	Encourages chiefs of police to receive training on issues pertaining to school and student safety and to be invited to meet annually with local superintendents to discuss emergency response plans and emergency response concerns.
156.095	Requires every public middle and high school administrator to disseminate suicide prevention awareness information to all middle and high school students by September 1 of each year. KDE shall develop and maintain a list of approved comprehensive evidence-informed trainings on child abuse and neglect prevention, recognition, and reporting that encompasses child physical, sexual, and emotional abuse and neglect.
158.148	KDE shall develop, or update as needed, statewide student discipline guidelines to ensure safe schools, obtain statewide data on major discipline problems and identify with the Kentucky Center for School Safety (KCSS) successful strategies currently being used in Kentucky and other states and incorporate into statewide guidelines. Each local school board shall formulate a code of acceptable behavior and discipline. The code shall be updated no less than every 2 years.
158.150	Requires pupils to comply with lawful regulations of schools. Establishes punishments for actions from willful disobedience and defiance, up to assault and battery or carrying deadly weapons.
158.153	Discusses punishment based on child's records. Unless the action is taken pursuant to KRS 158.150, no school, school administrator, teacher, or other school employee shall expel or punish a child based on information contained in a record of an adjudication of delinquency or conviction of an offense received by the school pursuant to KRS 610.345 or from any other source. This law also allows a local board of education to establish districtwide standards of behavior for students who participate in extracurricular and cocurricular activities, including athletics.
158.154	Outlines a principal's duty to report certain acts to local law enforcement agencies.
158.155	Requires that specified incidents of adjudicated student conduct prior to a student's admission to any school are reported to admitting schools.
158.156	Requires that school employees or local board members report felony offenses, under KRS 508, against a student by another student. Law enforcement agencies receiving the reports are required to investigate the incident.
158.160	Notification to school by parent or guardian of child's medical condition threatening school safety.
158.162	Requires the adoption of an emergency management response plan in each public school.
158.163	Requires school boards to establish an earthquake and tornado emergency procedure for each school.

Statute	Topic(s)
158.164	Requires local boards of education to require school councils to establish procedures for building lockdown practices.
158.440	Every student should have access to a safe, secure, and orderly school that is conducive to learning. All schools and school districts must have plans, policies and procedures for assisting students who are at risk of academic failure or of engaging in disruptive and disorderly behavior. State and local resources are needed for research, effective programming, and program evaluations that lead to success in addressing safety and discipline within the schools.
158.441	Defines *intervention services*, *school resource officer*, and *school security officer*.
158.442	Establishes the Center for Safe Schools. Includes submitting report to governor, Kentucky Board of Education, and Interim Joint Committee on Education by July 1 each year.
158.443	Details the KCSS board's organization and requirements.
158.444	Grants KDE authority to regulate school safety, student discipline, and related matters. Requires KDE to develop a statewide data collection system.
158.445	Requires local schools to complete an assessment of school safety and student discipline. Requires the district to develop a district plan on school safety to be eligible for school safety grants.
158.446	Discusses appropriations of safe school funds. KCSS gets 10 percent of funds allocated by General Assembly, and the rest goes to districts on a per-pupil allocation and shall be spent on improving school safety and student discipline through alternative education programs and intervention services.
158.447	Requires the local board to review crime prevention through environmental design principles when building a new school building or renovating an existing one.
158.448	Requires that KDE develop protocols for student records within the student information system.
158.449	Requires that each local school district provide KDE, via the student information system, "an assessment of school incidents relating to disruptive behaviors resulting in a complaint, including whether: (1) the incident involved a public offense or noncriminal misconduct; (2) the incident was reported to law enforcement or the court-designated worker and the charge or type of noncriminal misconduct that was the basis of the referral or report; and (3) the report was initiated by a school resource officer."
160.345	Requires school-based decision-making councils to select and implement discipline and classroom management techniques as a part of a comprehensive school safety plan, including responsibilities of the student, parent, teacher, counselor, and principal; to adopt an emergency plan; and to institute policies to address the school safety plan and requests from KCSS.
161.190	Makes it unlawful for any person to direct speech or conduct toward a teacher, classified employee, or school administrator when such person knows or should know that the speech or conduct will disrupt or interfere with normal school activities or will nullify or undermine the good order and discipline of the school.
161.195	Provides notice to teacher of student's history of physically abusive conduct or carrying a concealed weapon.

Statute	Topic(s)
Chapter 508	Details assault and related offenses.
525.070	Details the definition of *harassment* and sets harassment as a Class B misdemeanor.
525.080	Details the definition of *harassing communications* and sets it as a Class B misdemeanor.
527.070	Discusses the unlawful possession of a weapon on school property. It also requires signage for the schools to clearly state the prohibition of such weapons. Violation of this statute is Class D felony.
610.340	Addresses confidentiality of juvenile court records.
610.345	Establishes a method by which districts are notified when a student is adjudicated guilty in a case.

Source: Staff compilation of material from Kentucky Revised Statutes.

Appendix B

Districts' Board Policies Related To School Safety

Board Policy Number	Area(s) Covered
02.4241	School Council Policies selection and implementation of classroom management techniques
02.42411	Appeal of Decisions
02.442	School Improvement Plan to include district safety and student discipline assessments
03.1321	Use of School Property (Certified)
03.1325	Disrupting the Educational Process (Certified)
03.133	Duties (Certified)
03.14	Health and Safety (Certified) Hazard Communication Plan, Bloodborne Pathogen, Personal Protective Equipment, and Asbestos Management
03.173	Suspension (Certified)
03.1911	Professional Meetings
03.211	Medical Exam
03.2321	Use of School Property (Classified)
03.2325	Disrupting the Educational Process (Classified)
03.233	Duties (Classified)
03.24	Health and Safety (Classified) Hazard Communication Plan, Bloodborne Pathogen, Personal Protective Equipment, and Asbestos Management
03.27	Discipline, Suspension, and Dismissal of Classified Employee
03.6	Volunteer Background checks and orientation
04.6	Investments
05.21	Responsibility for School Property and Inspection of Playground Equipment
05.31	Rental Application and Contract
05.4	Safety (Facilities) Safety plans, Emergency planning
05.41	Fire Drills
05.411	Building Lockdowns
05.42	Severe Weather/Tornado Drills
05.43	Bomb Threats
05.45	Crowd Control
05.47	Earthquakes
06.12	Bus Fleet
06.2	Safety (Transportation) Transportation safety program
06.221	Bus Drivers' Use of Tobacco and Other Substances
06.32	Eligibility for Transportation
06.34	Conduct on Bus

Board Policy Number	Area(s) Covered
08.2323	Access to Electronic Media instruction on appropriate online behavior, parent permission forms
08.33	Emergency Closings
09.14	Student Records
09.2	Student Welfare and Wellness
09.21	Health Requirements and Services
09.213	Contagious Diseases and Parasites
09.22	Student Health and Safety bus safety instruction and suicide prevention for staff
09.221	Supervision of Students
09.2211	Employee Reports of Criminal Activity

Source: Staff compilation of material from Kentucky Board of Education.

Appendix C

Exemplary Practices

District	School	Description
Barren Co.	Hiseville Elementary School	Immaculately clean building, an exceptionally positive school environment, a variety of events for parents to learn about their role in an emergency at the school.
Bath Co.	Bath County High School	Each morning the principal greets students as they come to school, students raise their arms so principals can check for dress code and possible weapons. The principal knows the name of each student at the school. 87 percent of students answered they had a trusted adult at the school, often the principals.
Boone Co.	Boone County Schools	The district uses a safety committee consisting of school personnel, emergency management, law enforcement and fire officials to oversee safety program. All administrators are required to be trained in incident command, and all staff members have been trained in classroom emergency response techniques.
Calloway Co.	Calloway County High School	Three panic buttons throughout school; location known only to staff. When a button is pushed, each teacher, first responder, and principal in the district is notified of a lock-down. Staff members monitor each entry door, welcoming students in the morning.
Christian Co.	Christian County High School	"Together We're Better," a student voice program; 100 students are selected to participate in challenge course activities at Fort Campbell. Four "blue coats" observe class changes, deescalate potential problems, observe and supervise various areas of the building during class time.
Daviess Co.	Apollo High School	All district schools can send panic alarms directly to dispatch, a system alerting all county schools of an emergency with the push of a button; telephone installed in front office so any staff member can report an emergency.
Daviess Co.	Daviess County High School	The SRO at DCHS was described as "amazing" by teachers and students. The SRO greets students as they arrive in the morning, monitors the commons area, is proactive in learning about potential trouble spots.

District	School	Description
Daviess Co.	Daviess County Schools	The district films its own safety videos, holds poster contest for elementary students, has a safety committee that meets regularly and conducts accident investigations.
Henderson Co.	Henderson County Central Academy	Well-run alternative program; staff request to be there. Provides a school psychologist and counselor; low student-to-teacher ratio; a psychiatrist who makes weekly visits.
Henderson Co.	Henderson County High School	Critical Emergency Response Team students are trained, during Health Science II class, in emergency management. At the completion of the course, they are certified first responders.
McCracken Co.	McCracken County High School	A full-time and part-time nurse; two full-time social workers; school is in partnership with Four Rivers Behavioral Health and Baptist Health Paducah to offer a daily medical and mental health clinic in the school for students, staff, and parents. Employs two full-time and two part-time SROs.
Morgan Co.	Morgan County Middle School	To ensure all students are instructed in suicide prevention, bullying prevention, and Internet safety, the principal, assistant principal, and counselor each take a topic for presentation so all students receive a singular message.
Oldham Co.	Oldham County Schools	The district has a safety committee at each school who perform walk-throughs to identify issues; they have monthly safety topic discussions at all principal meetings within the schools. These steps have led to an improvement in safety.
Pulaski Co.	Pulaski County High School	Panic buttons in the office and two-way radios for administrators with direct access to 911 dispatch.
Shelby Co.	Shelby County Schools	As a result of Emergency Operation Plan training, all emergency responders in Shelby County have met at each of the schools to establish evacuation routes, tactical responses and equipment necessary for sundry emergencies. The meetings occur each month and result in several MOAs among and between all local emergency management agencies and the school district.

Source: Staff compilation of material from Kentucky Center for School Safety.

Appendix D

Areas Of Concern With Statutes And Policies

Statute Or Policy	Summary	Concerns
KRS 158.447	Requires Kentucky Department of Education (KDE) to ensure local boards review Crime Prevention Through Environment Design principles when constructing or renovating school buildings.	KDE has provided a checklist, but it is not part of the Facility Programming and Construction Criteria or part of the Building and Grounds process.
KRS 158.148 (1)-(4)	KDE shall develop or update, in cooperation with Kentucky Education Association, Kentucky School Boards Association, Kentucky Association of School Administrators, Kentucky Association of Professional Educators, Parent Teacher Association, Kentucky Chamber of Commerce, Farm Bureau, members of the Interim Joint Committee on Education and other interested groups and in collaboration with the Kentucky Center for School Safety (KCSS), as needed and distribute to all districts by August 31 of each even-numbered year: statewide student discipline guidelines, including the definition of *serious incident* for reporting purposes, recommendations designed to improve the learning environment and school climate, parental and community involvement in the schools and student achievement. It shall include successful strategies being used in programs in Kentucky and in other states in collaboration with KCSS.	KDE has not updated the statewide student discipline guidelines since 2003, and they currently do not include a definition of *serious incident*, nor do they have recommendations to improve the learning environment and school climate, parental and community involvement in schools and student achievement. They also do not identify successful strategies. The recently added definition of *bullying* is also not included.
KRS 158.148(5)	Each local board of education shall be responsible for formulating a code of acceptable behavior and discipline. The code shall be updated no less frequently than every 2 years. The superintendent, or designee, shall be responsible for overall implementation and supervision, and each school principal shall be responsible for administration and implementation within	One site visit district had not updated its code of acceptable behavior and discipline for 8 years. Some district codes did not include the required procedures, the strategies or methods of protection from retaliation, and the process for informing all

Statute Or Policy	Summary	Concerns
	each school. Each school council selects and implements the appropriate discipline and classroom management techniques necessary to carry out the code. The code has to contain • procedures for identifying, documenting, and reporting incidents of bullying incidents of violations of the code and reporting felonies under KRS 158.156; • procedures for investigating and responding to complaints; • a strategy or method of protecting from retaliation a complainant or person reporting an incident; and a process for informing students, parents, legal guardians, and school employees of the requirement of the code, including training for school employees. The principal of each school shall apply the code uniformly and fairly, and a copy of the code shall be posted at each school.	parties. Codes were not posted at each school. Most assistant principals and some guidance counselors are responsible for applying the discipline instead of the principal. School-based decision-making councils are adopting their own code of conduct matrix that does not match the district code. Examples include the following: • District has four levels of discipline events and resolutions; school has 1st, 2nd, and 3rd action. • District has bullying or cyberbullying as a level 1 violations which has no in-school removal and no investigation; school has bullying or cyberbullying as 1st action, with 1-3 days of in-school removal and an investigation. • District only has expulsion in level 4 behavior events; school discipline grid has no expulsions listed, even with alcohol and drugs. • For 1st offense of tobacco, district has 1 day of in-school removal and phase 1 of Tobacco Education Program (TEP); school has detention and parent contact. For 2nd offense, district has phase II of TEP and 2 day step; school has 1-3 days step. For 3rd offense, district has Phase 3 of TEP, 2 or more step days and referral to alternative

Statute Or Policy	Summary	Concerns
		placement program; school has 2-5 days of in-school removal, and TEP referral.
KRS 158.162	Adoption of emergency management response plan.	Schools are not compliant with requirements. See Table 4.2 on school safety assessment findings as well as Table 4.3 on compliance of emergency management and required drills.
KRS 158.442	Describes the responsibilities of KCSS and its board. KCSS is required to - serve as central point for data analysis, research, successful school safety programs, research results, and new programs; - analyze the data collected in KRS 158.444; - research and evaluate school safety programs so schools and communities are better able to address their specific needs; and - provide an annual report by July 1 of each year.	While KDE is providing the central point for data analysis, KCSS does have best practices and programs on its website. They provide curriculum for bullying, issues regarding school safety and the emergency management resource guide, which has been replicated in other states. While KCSS does provide school safety assessments upon request, all school and districts are not taking advantage of this. The annual report is not produced by July 1 each year. KCSS is assigned to serve as the central point for data analysis, but KDE is providing data analysis and using it to meet the requirements in KRS 158.444.
KRS 158.443	Duties of the KCSS board. The KCSS board is required to - approve a work plan for KCSS annually and - make recommendations for grants and development of model interagency agreements between local school districts and other local public agencies.	Annual work plan not being adopted. Recommendations for grants not being considered. Lack of model interagency agreements.
KRS 158.444	Duties of KDE regarding school safety. KDE is required to provide the Office of Education Accountability (OEA) and the	KDE is not collecting all of the data required by KRS 158.445.

Statute Or Policy	Summary	Concerns
	Education Assessment and Accountability Review Subcommittee (EAARS) with an annual statistical report of the number and types of incidents reported. The report shall include all monthly data and cumulative data for each year. Data should be sorted by individual school district, then by individual schools within that district, and then by individual grades within each school. It shall be delivered no later than August 31 of each year.	KDE does not report school safety data to OEA and EAARS in the required format. OEA does get raw data from KDE. Report is similar to what KCSS is required to perform in KRS 158.442. Report is not delivered by due date.
KRS 158.446 and approved Executive Branch budgets from 1999 through 2018	Use of appropriated funds (budget language has voided this statute for the last 16 years).	Statute has language for supporting exemplary programs, but KCSS has allocated funds to districts solely as a flat amount and then according to average daily attendance. KCSS has retained a slightly higher percentage of funds for operating expenses relative to statute, but budget language allows this.
Local Board Policy 02.442	School Improvement Plan. The plan shall address the reduction of physical and mental health barriers to learning, student equity, and priority needs.	This is currently not in Consolidated School Improvement Plans (CSIPs), because of the changes KDE made in recent years to the CSIP process.
Local Board Policy 05.21	Responsibility for School Property. The superintendent's designee shall monitor the condition of all playgrounds and play apparatus at the school, periodically inspect playgrounds and play apparatus, and report the results in writing to the superintendent.	Inspections were being performed, but the results were not being reported to the superintendent in writing.
Local Board Policy 05.4	Board to Adopt Plan. This policy discusses the adoption of a plan for immediate and long-term strategies to address school safety and discipline, which shall be reviewed annually and revised as needed. The plan shall identify measures to be taken in protecting students, staff, visitors, and property.	While most of the districts visited had lots of information in various pieces that would fit into this plan, there was no one plan on safety that encompassed the entire array of information.

Statute Or Policy	Summary	Concerns
	Areas addressed by the plan shall include, but not be limited to, employment practices and employee management, school facility design, maintenance and usage, safety and security procedures, orientation and training in use and management of equipment and facilities, supervision of students, compliance with state and federal safety requirements, quarterly reports to the board concerning implementation of the plan and its effects on district students, personnel and operations, emergency/crisis intervention, and community involvement.	

Source: Staff compilation from Kentucky Revised Statutes, Kentucky Administrative Regulations, and local board policies.

Endnotes

[1] US. Dept. of Educ. *Indicators of School Crime and Safety: 2015*. NCES 2016-079. Washington: USED, May 2016.
[2] Ibid.