July 17, 2019

The Honorable Stephanie E. Hulsey  
Judge of the Superior Court  
County of Monterey  
240 Church Street  
Salinas, CA 93901

RE: Response to the 2018-2019 Monterey County Civil Grand Jury Final Report - IMPROVING SCHOOL SHOOTING PREVENTION AND RESPONSE TRAINING IN MONTEREY COUNTY

Dear Honorable Judge Hulsey:

The Monterey County Superintendent of Schools has carefully reviewed and considered the Findings and Recommendations set forth in the 2018-2019 Monterey County Civil Grand Jury Final Report entitled, Improving School Shooting Prevention and Response Training in Monterey County. This letter shall serve as the official response of the Monterey County Superintendent of Schools to the Findings and Recommendations of the Monterey County Civil Grand Jury.

The Monterey County Superintendent of Schools holds student and staff safety as a top priority. Every student must have a safe, healthy, and productive school environment in order to learn, grow and thrive. We agree with the Grand Jury’s research which notes that schools remain one of the safest locations for students, faculty, and staff; and we also agree that more can be done to improve training efforts for school shooting preparedness in Monterey County. For several years, the Monterey Office of Education (MCOE) staff has actively been meeting with Monterey County First Responders (Office of Emergency Services, Monterey County Sheriff’s Office and all local law and fire agencies), to develop a standardized approach to planning, training, and policy amendments for crisis and emergency response.

Formed in 2015, an Educational Affinity Group comprised of representatives from all of Monterey County’s twenty-four (24) School Districts, California State University - Monterey Bay and the two Monterey Community Colleges, was tasked with:

1. identifying gaps in the Comprehensive School Safety Plan(s) (CSSP) within Monterey County schools;
2. building resilience within the education community and its OES partner;
3. determining a standardized format for all District and County Office CSSP’s; and
4. building proactive and routine engagement with the law enforcement and emergency response agencies within Monterey County.
Regional round table meetings were also held within the twenty-four (24) school district boundaries. Those meetings generated ideas and formed data brought to the Educational Affinity Group so that goals could be established and norms identified. The recommendations from the Educational Affinity Group were that all twenty-four (24) school districts and the Monterey County Superintendent of Schools should:

1. standardize the training methodology as it relates to CSSP's;
2. implement and train educators on the proper incident command structure (ICS); and
3. identify an active shooter training model.

The Monterey County Superintendent of Schools implemented the Educational Affinity Group’s recommendations and selected ALICE (Alert, Lockdown, Inform, Counter, Evacuate) as the active shooter trainer model. The ALICE model was presented to and agreed upon by all twenty-four (24) school districts. The ALICE model is designed to train stakeholders in the following order:

1. Administrative and Management staff;
2. Teachers and Classified staff;

To date, MCOE has trained over fifty (50) ALICE Instructors across Monterey County, ranging from classified staff and school site principals to school resource officers.

While MCOE has taken the lead to facilitate a standardized approach to comprehensive school safety planning and has provided numerous training workshops, MCOE relies on district governing boards and superintendents to ensure appropriate stakeholder trainings are occurring within the districts. MCOE is committed to partnering with school districts and recommending safety training implementation timelines. Additionally, we recognize that site based safety oversight is the role of each school district’s administration and board of trustees who maintain local control.

As noted in the Civil Grand Jury report, MCOE verifies annually that each Local Educational Agency (LEA) or school site within each district has an updated and district board approved CSSP prior to the March 1st statutory deadline. Our responses to the Monterey County Civil Grand Jury will also show that MCOE has provided numerous trainings and professional development opportunities countywide. Crisis management and emergency response is not the sole responsibility of the Monterey County Superintendent of Schools, but rather a shared responsibility across government agencies, local educational agencies and the community at large. I appreciate the Monterey County Civil Grand Jury’s focus on school campus safety and look forward to working with our stakeholders to ensure school campus safety remains a top priority in Monterey County.

Sincerely,

Dr. Deneen Guss
Monterey County Superintendent of Schools
Findings

F1. Student involvement in the school shooting prevention and response planning process at all Monterey County high schools is important.

   X AGREE
   _____ PARTIALLY AGREE
   _____ DISAGREE

Response:
The County Superintendent agrees with this finding. Including students through the School Site Council or inviting students to participate on the Safety Planning Committee will ensure student voice is always considered when planning for safe learning environments. MCOE will ensure districts are reminded that Education Code (EC) 656500 c.2 already requires students to be included on secondary School Site Councils. While not required by law, MCOE will also encourage districts to include students on district safety planning committees (EC 32281).

F2. Reimbursement for school safety costs mandated by the state are available but are inconsistently sought to the fullest extent possible by MCOE, schools, and each school district in the county.

   _____ AGREE
   _____ PARTIALLY AGREE
   X DISAGREE

Response:
The County Superintendent disagrees with this finding. Based on our review, all twenty-four (24) Monterey County school districts are participating in the Mandated Cost Block Grant (MCBG). Under the old state mandated cost reimbursement program, districts would file a state claim and wait many years to be reimbursed. The state created a new method for reimbursement under the MCBG which allows districts to receive annual revenue based on average daily attendance. All California school districts were given an option to continue to collect mandated cost reimbursements under the old state method or to participate in the new MCBG. In Monterey County, all twenty-four (24) school districts are participating in the MCBG program and are receiving their full ADA funding allocation annually. We believe that there is no wrong or right approach to mandated costs. Each district reviewed its fiscal condition and made a determination to participate in the MCBG program. That decision was appropriately based on local district governance.

F3. Despite the availability of numerous school safety resources provided at no charge by highly respected and relevant government and professional organizations, few high school principals in Monterey County are utilizing these resources.

   _____ AGREE
   _____ PARTIALLY AGREE
   X DISAGREE
Response:
The County Superintendent disagrees with this finding and recognizes that each Monterey County School district has the ability to utilize resources that meet the needs of their student and staff populations. There are many resources available at no charge from various agencies and entities. Each district must ascertain which resources best meet the needs of their student and staff populations.

F4. Schools are not fully utilizing on-line shooting prevention and response training modules as part of their means for providing safety instruction.

_____ AGREE
_____ PARTIALLY AGREE
_____ DISAGREE

Response:
The County Superintendent partially agrees with this finding. Considering school districts are at different phases with implementing ALICE, usage of on-line tools will continue to be more common. While MCOE recommends a blended learning approach that includes on-line, and face-to-face site trainings, we understand districts must decide which approach works best for their students, staff, school calendars and daily schedules.

F5. School shooting training exercises and drills need to be well planned and well executed in order to maximize benefits and minimize their adverse impact.

_____ AGREE
_____ PARTIALLY AGREE
_____ DISAGREE

Response:
The County Superintendent agrees with this finding.

F6. Most, if not all, of the five school shooting training areas identified by the MCCGJ:

1. Active Shooter (e.g., ALICE),
2. Suicide Prevention,
3. Anti-Bullying (including tolerance, harassment, and conflict resolution),
4. When, how, why, and to whom stakeholders should report issues of violence concern, and
5. How to assess and mitigate potential threats of violence when they occur

Are applicable to the following school stakeholders:
Principals
School resource officers (when used)
On campus probation officers (when used)
Security officers (including campus monitors)
Substitute teachers
Special needs teachers
General education teachers
Paid teacher aids (including instructional assistant, behavior techs, academic coaches)
Athletic coaches
Special needs students
General education students
Guidance counselors
School psychologists
School bus drivers
Cafeteria workers
School nurses
Custodial personnel
Maintenance personnel
Clerical personnel
Parents
Fire, police, and emergency medical first responders and their command personnel

Response:
The County Superintendent agrees with this finding. The identified stakeholder groups are vital to the success of safe school environments. There have been focused efforts across the Monterey County to ensure that broader stakeholder engagement is a top priority.

F7. Most high school stakeholders in Monterey County have not received adequate training in the five types of school violence prevention and response.

Response:
The County Superintendent partially agrees with this finding. Substantial progress has been made in the five training areas, however, more work is needed to ensure that all stakeholders are adequately prepared and supported through district and countywide trainings.

In 2019, the Monterey County Office of Education hosted the first annual All In For Equity Conference that included a focus on the social and emotional needs of all students. Conference topics included information and resources to address implicit bias and stereotypes that often lead to bullying and acts of violence on school campuses. In addition, ongoing professional learning sessions are provided to assist schools in implementing proactive measures through Multi-Tiered Systems of Support (MTSS).

Listed below are a variety of training sessions hosted by the MCOE relevant to school crisis intervention and emergency response.

**Active Shooter**
- ALICE 100
- ALICE Train the Trainer
In reviewing several years of training schedules and evaluations for MCOE, we confirmed our office has provided countywide training to a variety of stakeholders. Below is a list of school stakeholders that have attended these trainings across Monterey County:

- Principals
- Asst. Principals, Vice Principals
- Teachers
- Intervention specialists
- Classified staff
- Probation Officers
- Substitute teachers
  - *Schools are trained on how to train substitute teachers about PBIS system.
- Special needs teachers
- Counselors
- Psychologists
- Mental health clinicians
- District staff
- Parents. Trained by school site staff.

F8. Students, the largest high school stakeholder group, are the most vulnerable, the most likely to perpetrate or be victims of a school shooting, and to know when a peer may be at risk but have one of the lowest training rates.

____ AGREE
____ X PARTIALLY AGREE
____ DISAGREE
Response:
The County Superintendent partially agrees with this finding. Countywide, school districts are working to implement ALICE and other social emotional support programs; however, more work can be done to ensure students know how to identify an at risk peer, and have the confidence to share those concerns with a trusted adult. As MCOE continues its work in developing additional countywide professional development, we are committed to providing more support to districts in this area.

F9. Many students, faculty, and staff joining school mid-year may miss receiving critical school shooting-related material until the next time that training is offered.

----- AGREE
----- X PARTIALLY AGREE
----- DISAGREE

Response:
The County Superintendent partially agrees with this finding. On-boarding of new students, faculty and staff mid-year can be challenging. Districts have access to on-line trainings that allow on-boarding of new employees to occur quickly. Accountability mechanisms are also important to ensure mid-year student arrivals participate in the appropriate drills in a timely manner. Follow up from the appropriate district personal is critical to prevent delays in required trainings. MCOE is committed to working with districts to offer trainings on-line or more frequently to address training needs.

Recommendations

R1. By July 31, 2019, the Monterey County Superintendent of Schools should provide a copy of this report to the MCOE Chief Officer of General Services and Business Support and to the principals of the public high schools in the county.

----- X HAS BEEN IMPLEMENTED
----- HAS NOT BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED IN THE FUTURE
----- REQUIRES FURTHER ANALYSIS
----- WILL NOT BE IMPLEMENTED

Response:
The Monterey County Superintendent of Schools provided a copy of the Civil Grand Jury final report entitled, “Improving School Shooting Prevention and Response Training in Monterey County” to the MCOE Chief Officer of General Services and Business Support, each high school principal and their district superintendent.

R2. By July 31, 2019, high school students should be included in all future School Site Council and School Safety Planning Committee safety planning sessions that pertain to high school-level students, faculty, and staff.

----- X HAS BEEN IMPLEMENTED
----- HAS NOT BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED IN THE FUTURE
Response:

MCOE will ensure districts are reminded that Education Code (EC) 6500(2)(C) requires students to be included on secondary School Site Councils. While not required by law, MCOE will also encourage districts to include students on safety planning committees (EC 32281). In future MCOE safety trainings, this information will be shared with districts.

R3. By January 31, 2020, The Monterey County Superintendent of Schools should develop and implement a plan to address and improve the low training rate of students.

Response:

As stated in ALICE training materials, ALICE trainers recognize in the event of an active shooter situation, “the natural human response, even if one is trained, is to be startled, feel fear and anxiety, and even experience initial disbelief and denial.” Thus, training is extremely important as it provides individuals the ability to practice appropriate responses that allow the brain to recall the most current trained response during times of high stress. The ALICE model provides an options based response strategy during active shooter and other high stress crisis and emergency events.

The Civil Grand Jury’s survey asks if students, both special needs and regular education, have participated in a half day, full day, or two day ALICE training. Students do not need to participate in these types of lengthy trainings to fully understand ALICE’s option based response strategy. More importantly, ALICE does not require students to attend half day, full day or two day sessions; however, ALICE does recommend students participate in routine active shooter drills either on campus or tabletop.

In Monterey County, ALICE certified trainers provide scenario based trainings to school district staff and that staff in turn train additional staff and students through on-campus or tabletop active shooter drills. Drills include all of the ALICE tenets: Alert, Lockdown, Inform, Counter, Evacuate. Most school districts have reported to the Monterey County Office of Education that students have been participating in scheduled and routine active shooter drills at their school sites.

The Monterey County Superintendent of Schools is committed to continuing to organize and facilitate meetings with district superintendents and their safety personnel to increase participation in active shooter drills and comprehensive safe school trainings including: suicide prevention, anti-bullying, reporting issues of violence, and how to mitigate potential threats of violence. The County Superintendent believes in the importance of on-going training, and also understands each school and district is at different phases of the ALICE implementation.
R4. By August 31, 2019, all local education agencies, schools and school district in Monterey County should seek full reimbursement for all school safety cost mandated by the State of California.

__X__ HAS BEEN IMPLEMENTED

___ HAS NOT BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED IN THE FUTURE

___ REQUIRES FURTHER ANALYSIS

___ WILL NOT BE IMPLEMENTED

Response:

As all twenty-four (24) Monterey County school districts are collecting Mandated Cost Block Grant reimbursements, we confirmed districts are collecting their full state allocation. Currently, the Mandated Cost Block Grant includes reimbursement for forty-eight (48) mandated programs which includes Comprehensive School Safety Plan (CSSP) development and implementation. We recognize the additional tactical response to criminal incidents as an additional training component to the CSSP; however, it is not a separate line item on the Mandated Cost Block Grant. A school district or county office of education that receives Mandated Block Grant funding is not eligible to submit additional separate claims to the State Controller for reimbursement. Should the Commission on State Mandates determine that the new code requirement contains costs mandated by the State, those costs will be funded by the MCBG.

R5. By August 31, 2019, available school shooting prevention and response training resources developed by highly respected and relevant government and organization and professional associations should be utilized to help enhance school safety plans and policies in Monterey County.

__X__ HAS BEEN IMPLEMENTED

___ HAS NOT BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED IN THE FUTURE

___ REQUIRES FURTHER ANALYSIS

___ WILL NOT BE IMPLEMENTED

Response:

The Monterey County Superintendent of Schools already provides school districts with training, support, and resources for comprehensive school safety planning. During countywide trainings, districts are provided links to various relevant, no cost resources that can be utilized in their school safety planning efforts. The County Superintendent will continue to promote the use of relevant, no cost materials during countywide safety trainings and has also added a link to these resources on the MCOE School Safety and Emergency Resources webpage.

R6. By August 31, 2019, on-line school shooting prevention and response training modules and assessment tools should be utilized when appropriate to help ensure school safety instruction is provided in a timely manner.

__X__ HAS BEEN IMPLEMENTED

___ HAS NOT BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED IN THE FUTURE

___ REQUIRES FURTHER ANALYSIS

___ WILL NOT BE IMPLEMENTED
Response:
The Monterey County Superintendent of Schools has promoted the use of active shooter training and resources through the ALICE training institute to the districts. As districts implement ALICE training, each district determines the best delivery model. ALICE includes on-line as well as instructor-lead training. We are committed to continue to work with local school governing boards and district leadership staff to ensure safety resources, including on-line active shooter prevention and response, are shared with stakeholders. Additionally, we will continue to maintain and promote district use of MCOE’s School Safety and Emergency Resources webpage and its available resources. MCOE staff has also been directed to work with the ALICE Training Institute to ensure district leaders are receiving regular reports regarding on-line participation. MCOE staff will also ensure this topic is reviewed at MCOE districtwide safety trainings and meetings.

R7. By August 31, 2019, all active shooter training drills should be reviewed by MCOE to make sure they are appropriate for each stakeholder category and age group for which their use is being considered.

HAS BEEN IMPLEMENTED
HAS NOT BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED IN THE FUTURE
X REQUIRES FURTHER ANALYSIS
WILL NOT BE IMPLEMENTED

Response:
Well planned and executed drills will have positive results on school safety and properly prepare stakeholders to respond should an active shooter incident occur. ALICE provides appropriate age level training and drills for elementary, middle school and high school students. The Monterey County Superintendent of Schools coordinates efforts with districts to ensure age appropriate delivery of active shooter drills. MCOE will continue to review drill implementation strategies with district superintendents and district safety personnel. This will ensure district site staff are meeting the expectations of active shooter drill planning, implementation and execution. The Monterey County Superintendent of Schools will continue to provide crisis and emergency response trainings and support to districts that may require more assistance. The appropriateness and effectiveness of active shooter drills may be best reviewed by school site and district staff alongside local law enforcement.

R8. By August 31, 2019, all school stakeholder groups should be included in future school shooting prevention and response training activities applicable to them.

HAS BEEN IMPLEMENTED
HAS NOT BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED IN THE FUTURE
X REQUIRES FURTHER ANALYSIS
WILL NOT BE IMPLEMENTED

Response:
In order to implement this recommendation, local school district governing boards and district leadership involvement is essential. To ensure broad stakeholder engagement, MCOE co-sponsored the first annual School Safety Symposium in 2018. This symposium was open to all stakeholder groups within the region, and attended by over two hundred (200) individuals across four (4) counties. Stakeholder groups included: state and local law enforcement, school safety personnel,
school and district administrators, parents, community members, mental health and medical professionals.

In order to continue the momentum from the symposium, MCOE staff has been directed to work with district superintendents and school safety personnel to develop a plan which determines the most efficient approach to stakeholder engagement as it relates to active shooter training. The Monterey County Superintendent of Schools is committed to ensuring all school district and community stakeholders are well informed on active shooter training and prevention. Moreover, MCOE continues to be committed to expanding county professional development to include the community at large.

R9. By August 31, 2019, school shooting training materials should be prepared and used to train new high school students and employees joining the school mid-year as part of the regular “on-boarding” orientation process.

___  HAS BEEN IMPLEMENTED
___  HAS NOT BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED IN THE FUTURE
___ X  REQUIRES FURTHER ANALYSIS
___  WILL NOT BE IMPLEMENTED

Response:

In order to effect change at the school site level across the county, the Monterey County Superintendent of Schools must work through school district governing boards and district leadership. We are committed to providing recommendations and strategies districts can use to manage on-boarding of their employees, and ensure all stakeholders, including high school students, are trained in active shooter response. The student training model will continue to be delivered in the form of active shooter drills on campuses or other age appropriate approaches. Our office will maintain the standardized protocol which requires countywide Safety Committee Meetings to include the review of district personnel on-boarding as it relates to active shooter training.

MCOE currently offers three fall and two spring ALICE training sessions held at MCOE and will be more direct in future trainings to point out the need for mid-year and on-boarding trainings to ensure all stakeholders are prepared. MCOE will evaluate whether or not a third mid-year ALICE training should be offered.