



LEGISLATIVE BRIEF

WHAT'S CHANGING IN SCHOOL SECURITY FOR THE 2023-24 SCHOOL YEAR

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During the 2023 legislative session, new requirements for school security and funding increases to implement both new and existing requirements were proposed, revised, passed, and signed into law by the Governor and the General Assembly. Key changes summarized in this brief include new state funding and changes in funds distribution; new requirements for annual school security assessments and safety plans, with particular attention to locked school doors; new safety drills and the creation of threat assessment teams; changes in building requirements for new and remodeled schools; and the inclusion of private schools for some state funding and some security requirements.^A

The new school security requirements, effective as of July 1, 2023, are primarily laid out in Public Chapter 367 (2023) (referenced in this brief as “the new law”) but are also reflected in last year’s legislation creating the Tennessee Investment in Student Achievement (TISA) education funding formula, Public Chapter 966 (2022). New or increased funding levels for school security efforts are detailed in the appropriations act, Public Chapter 418 (2023).

Funding changes and increases

Safe Schools Grant now part of TISA funding

State funding totaling \$19 million from the former Safe Schools Grant has been folded into the per-pupil base funding allocation in the new TISA formula. Districts and charter schools are authorized to use the TISA base funding for the same types of school safety needs for which they previously used the separate, recurring Safe Schools Grants.

Previously, the Tennessee Department of Education (TDOE) awarded the grants to all school districts (including any of their authorized charter schools) based on their state BEP funding levels and required a 25 percent local match, adjusted for fiscal capacity.^B Districts had to explain how they would direct funds toward needs identified during their schools’ security assessments. (See more about security assessments on p. 10.)

The former Safe Schools Grants grew from \$4.8 million in fiscal year 2017-18 to \$10 million in 2018-19 and to \$20 million in 2019-20, remaining at \$20 million through fiscal year 2022-23. The total grant in its final year included \$19 million for school districts and \$1 million for administrative costs.

New funding in 2023-24 state appropriations act and 2023 special session legislation

New funding was appropriated for individual public school needs, private school needs, and statewide supports, including:

- **\$140 million (recurring) for at least one full-time School Resource Officer (SRO) in every public school, including both traditional and charter schools.** The grants are for a maximum of \$75,000 per year, administered by the Department of Safety’s Office of Homeland Security and awarded to local law enforcement agencies, to provide one SRO to every school. A signed Memorandum of Understanding (MOU) between the law enforcement agency and the local school district or public charter school must be included in the grant application. Grant funds can cover SRO salaries, benefits, training, and equipment. With these new state grants,

^A In this brief, the term “private schools” includes church-related schools. Church-related schools is one of the non-public school categories defined by the State Board of Education. State law defines a “nonpublic school” as a private school, church-related school, or home school.

^B Although state law assigned the authority for awarding Safe Schools Grants (also referred to as school safety grants) to the Tennessee School Safety Center, this is an outdated name no longer in use. In practice, the center comprises TDOE staff members assigned to school safety responsibilities within the department.

any local funding from counties or cities used in the past by school districts or law enforcement for SROs will be available for other purposes. Law enforcement agencies receiving the grants are required to report quarterly on the number of districts and charter schools that have executed an MOU under the grant program and that have been assigned a full-time SRO, including breakdowns by elementary or secondary schools. Previously, TDOE administered one-time SRO grants, which were distributed over three years, beginning in 2019-20, with \$20 million in nonrecurring funding.

- ***\$10 million (nonrecurring) for additional school safety supports for public schools (traditional and charter schools) without full-time SROs for the 2023-24 school year.***^c This funding, which was approved during the special session, authorizes TDOE to provide additional school safety grants to schools that cannot leverage the \$140 million SRO funding because their local law enforcement agencies do not yet have the staff capacity to provide SROs.
- ***\$40 million (nonrecurring) to enhance school safety through one-time Public School Security Grants.*** These grants are similar to the former Safe Schools Grants in that all districts that apply will receive a share of the grant funds but different in that no local matching funds are required. Grant funds will be allocated based on districts' enrollment (average daily membership) and disbursed as reimbursement for approved expenditures. Grants can be used for a variety of security needs, and districts are expected to use the one-time funds for their highest priority needs determined through their school security assessments. (See more about security assessments on p. 10.)

The grant application requires essentially the same elements previously required in the Safe Schools Grants: descriptions of how funds will improve and support school safety, how the use of funds aligns with the needs identified by the school security assessments, and how funds support any authorized charter schools in the district. Additionally, districts must show that they are in compliance with other safety requirements, including the submission of annual school security assessments and district- and school-level safety plans. (See more about safety plans and school security assessments at pages 6 and 10.) TDOE is required to submit quarterly reports to designated legislative members and staff detailing which districts and charter schools applied for the grants, which ones received grants or were denied, and how the grant funds were used.

- ***\$14 million (nonrecurring) to enhance school safety through one-time Non-public School Security Grants.*** TDOE set a deadline of August 4, 2023, for private (including church-related) schools to indicate their intent to apply for a grant and has since awarded \$13.5 million to applicant schools. Similar to the public school grants, the non-public school grants were allocated by enrollment. A small reserve fund was held for schools that applied after the deadline.

Private schools must use the funds specifically for their school facilities; church-affiliated schools with umbrella programs cannot distribute funds to their satellite home school locations. Grant funds can be used for a variety of school safety needs such as improved physical school security (e.g., perimeter control, surveillance, etc.), SROs or school security officers (SSOs), emergency planning, security consultation, and safety training for school staff, and will be disbursed as reimbursements. Mirroring the requirements for public school grants, TDOE is required to submit quarterly reports to designated legislative members and staff detailing which non-public schools applied for the grants, which ones received grants or were denied, and how the grant funds were used.

^cFunding is for schools without full-time SROs prior to the effective date of the law, which was September 8, 2023.

- ***\$8 million (recurring) for additional school-based behavioral health liaisons across the state, administered through the Department of Mental Health and Substance Abuse Services (DMHSAS).***

The liaisons, who are employed with private community health providers under contract with DMHSAS, are assigned to designated public elementary, middle, and high schools in each county. As of June 2023, each county had at least one funded liaison, and about 30 percent of counties had more than one. The new funding nearly doubles existing state funds for the program, which will allow for expansion of liaison services.

The liaisons help connect students and parents to mental health services; provide individual counseling or group interventions for students, with parent consent; and provide training to and consultation with teachers and other school staff on the best approaches to help students who may be dealing with a variety of behavioral health issues. Liaisons also collaborate with the Department of Safety's Office of Homeland Security to address school safety and security and can assist schools in development of safety plans and provision of supports after a school crisis.

- ***\$30 million (\$15 million recurring; \$15 million nonrecurring) to Department of Safety for additional Homeland Security agents, support staff, and records management system to expand its school safety initiative to all 95 counties.*** The department is planning to expand Office of Homeland Security (OHS) staffing from 18 agents and nine analysts to 134 agents, 10 analysts, and five support staff to address school security as a top priority, in addition to covering its other security responsibilities such as counter-terrorism, critical infrastructure and major event security, cybersecurity, and intelligence sharing.

OHS agents advise and assist schools and local law enforcement agencies with school security assessments and developing emergency response plans, consult on schools' implementation of security standards, and conduct physical security reviews of school facilities. Agents also provide investigative support and expertise in threat investigations of at-risk persons, consult with districts on development of their threat assessment teams, and monitor and share threat information with schools and local law enforcement. (See more about school security assessments, emergency response plans (also referred to as school safety or emergency operations plans), and threat assessment teams at pages 6 and 10.)

New requirements for all schools — locked doors, safety drills, training

Enforcement of locked school entrances

Building entrances at all schools – public (traditional and charter) and private (including church-related) schools – are required to be locked at all times while students are present, during the school day and during school-related activities outside of regular hours. Access to school building must be limited to a single primary entrance unless otherwise determined by school policy. Exceptions are allowed during a school-related activity if the door is continually physically monitored by a school or district employee. The new law includes penalties for public schools found to have unlocked doors.

Law enforcement personnel are authorized to inspect school doors at public schools to ensure compliance. Additionally, the State Fire Marshal's Office, while conducting its school fire safety inspections, will report unlocked doors to the Department of Safety and the Department of Education under the new law.

If a door is found unlocked, the school must immediately lock it. Law enforcement is required to notify school and state leaders and any other local law enforcement in the jurisdiction of the violation within 24 hours. After notification of the violation, the director of schools or leader of the charter school, or their designees, must send written confirmation to the notifying law enforcement agency, and all other parties that received the violation notification, that the door was immediately locked, that processes are in place to ensure that door remains locked, and whether the school has a full-time SRO.

Penalties are prescribed for public schools found to have two or more unlocked door violations within the course of one school year:

- a full-time SRO or SSO is assigned to the school at the district’s or charter school’s expense if the school does not already have such personnel,
- state funds generated by TISA are withheld if subsequent unlocked door violations are found, and
- for schools with an assigned full-time SRO or SSO, state funds are withheld after the second violation.

If funds are withheld, they will continue to be withheld until the district or charter school has the SRO/SSO assigned to the school and has received TDOE’s approval of a corrective action plan.

The multi-layer enforcement plan stems from findings by the State Fire Marshal’s Office during its inspections of more than 1,000 public and private schools in 2022-23. As of January 2023, 172 schools (about 17 percent of those inspected) were found to have at least one unlocked exterior door.

New safety drills required of public and private schools

Private (including church-related) schools must conduct at least one armed intruder drill each year, and all schools – public and private – must begin conducting an incident command drill and an emergency bus safety drill, if they provide bus service, at least once per year.

An annual armed intruder drill has been required in public schools since 2017. The new law requires private schools to also conduct at least one armed intruder drill each year. The drills are required to be conducted in coordination with appropriate local law enforcement agencies. During drills or in emergency situations, districts and charter schools are to provide law enforcement with access to security systems to the greatest extent practicable, such as cameras, audio and visual recording systems, alarm systems, etc.

Specific procedures for armed intruder drills have not been prescribed in state policy, but best practices suggest lockdown drills – which involve sheltering in a secure location, locking the door, moving students out of sight, and requiring students to remain quiet within the room, and do not include role-playing or simulations – are one effective type of school safety preparedness.

New drill requirements for all schools, starting July 1, 2023, add one incident command drill and one emergency safety bus drill to other required drills every year.^D These new drills must be conducted at public schools without students present. Those conducted by private schools may be conducted with or without

^D Public schools were already required to annually conduct one fire drill within the first 30 calendar days of the beginning of school and one fire drill every 30 school days during the year, the armed intruder drill, and at least three additional safety drills (two of which may be earthquake drills for schools within 100 miles of the New Madrid Fault Line).

students present. Although not defined in law, TDOE indicates that the incident command and emergency bus safety drills are discussion-based exercises, also known as tabletop exercises. Both drills are to prepare school staff and law enforcement agencies on what to expect in emergency situations. Tennessee Department of Safety, Tennessee Emergency Management Agency, and TDOE will work together to provide schools and districts with best practice guidelines and training for these new drills.

TDOE plans to work with other state agencies in providing school districts best practice guidelines for conducting these drills and providing training for these new drills.

Upgraded training requirements for security guards

Training requirements were revised to mandate an eight-hour active shooter training for any licensed, armed security guard who provides security or patrol services for any elementary, middle, or high schools, public or private. Additionally, the law now requires security guards who will be posted to schools to complete all their training *before* starting their school duties, rather than within a specified time after they start.

New training requirements were adopted for both unarmed and armed guards who are either:

- employed by private security companies under contract with a school and who are posted to a district or school, public or private, or
- hired directly as employees by a district or school, public or private. (Security guards hired by public schools were previously exempt from training and licensure.)

These guards with private protective services licenses are different from school resource officers (SROs) and school security officers (SSOs) in that they are not sworn law enforcement officers employed by a law enforcement agency.

Generally, unarmed guards can complete their training and exam requirements within 15 days of employment and armed guards can complete their additional training within 60 days of employment. However, if the guards – armed or unarmed – will be posted to any elementary, middle, or high school, public or private, they must complete all their training and exam requirements before being posted to a school. Unarmed guards must complete a four-hour general training (legal powers and limitations, emergency procedures, and general duties) and pass an exam; armed guards must do the same plus complete additional training that includes:

- at least eight hours of classroom firearms training (legal limitations of firearm use, handling of firearms, safety and maintenance) and pass an exam,
- at least four hours of marksmanship training and pass a firing accuracy exam, and
- no less than eight hours of active-shooter training.

The requirement for unarmed guards to renew their security registrations every two years remains a two-hour refresher course. For armed guards the two-year renewal requirements are expanded to include an active-shooter refresher training, in addition to the four-hour classroom firearm refresher training and requalifying through a firing accuracy exam.

Planning and assessment changes

Changes to public school safety plans

While school safety plans at both the district level and school-building level have been required for public schools since 2007, new deadline and annual submission requirements have been added in law. Each district and charter school (to the extent applicable) is now required to review, adopt, and submit its districtwide and building-level safety plans to the specified state and local authorities annually by July 1, before the start of a new school year.^E Previously, districts submitted their safety plans on a five-year cycle, with about 30 districts required to submit each year.

The law refers to safety plans that address crisis intervention, emergency response, and emergency management. Over the years, these safety plans have come to be commonly referred to as *emergency operations plans* (EOPs).

State-level Safety Team sets EOP content. The State-level Safety Team, which develops the EOP templates that districts and schools are required to use, will be led by the Commissioner of Safety starting on July 1, 2023. Originally established in 2007 by the SAVE Act, the State-level Safety Team is required to include representatives from eight state agencies and three professional associations.^F While the 2023 statute revisions changed the responsibility for establishing and leading the team from the Commissioner of Education to the Commissioner of Safety, its duties to regularly review and update the comprehensive templates that districts and schools use for their required district- and building-level EOPs remain unchanged. The most recent template for districts is available at https://www.tn.gov/content/dam/tn/education/safety/save-act/2022_District_EOP_Templateupd-8-16.docx and for schools at https://www.tn.gov/content/dam/tn/education/safety/save-act/TEMPLATE_School_EOP_22-23.docx.

District and school safety teams develop EOPs. Each district – and to the extent applicable, each charter school – is to adopt district and school EOPs developed by district-wide and building-level school safety teams, respectively. Unchanged by the 2023 law, the district-level teams are required to be appointed by directors of schools from district staff, the school board, and student, teacher, administrator, and parent organizations. The building-level teams are to be appointed by school principals, under guidelines prescribed by directors of schools, and must include representatives from school staff, and representatives from teacher, administrator, and parent organizations, plus community members, local law enforcement officers, and emergency response agency staff. District or charter schools with only one school building develop a single building-level EOP, which also fulfills the requirements of district-level EOPs.

^E Note that the original Schools Against Violence in Education (SAVE) Act, passed in 2007, included a requirement that each safety plan be reviewed by the school and district teams on at least an annual basis and updated as needed. However, that requirement was replaced by a 2017 revision that required armed intruder drills and was not incorporated elsewhere in statute. At the same time, TDOE changed its practice of requiring annual submission of safety plans from all districts to a five-year submission schedule. Beginning in 2016-17, districts were assigned to a five-year submission calendar with about 30 districts required to submit their district-level and school-level safety plans each year. The five-year cycle safety plan cycle for districts was aligned with counties' emergency management planning cycles.

^F The Commission of Safety is the appointing authority and director of the team, starting July 1, 2023. Other state agencies required to be represented on the team include the Department of Education; Department of Mental Health and Substance Abuse Services; Health; and Intellectual and Developmental Disabilities; Tennessee Bureau of Investigation; State Board of Education; and the Office of Homeland Security.

District-level plans vs. building-level plans

School safety plans are commonly referred to as emergency operations plans, or EOPs.

District EOPs set the stage for school-level EOPs by providing standards and, where appropriate, uniform response protocols. District EOPs also ensure that adequate and appropriate planning occurs with the broader school community and that district-level resources will be directed to support schools when needed.

School (building-level) EOPs provide the individually tailored planning, support, and direction needed to address the unique needs of each school.

Source: Tennessee Department of Education's 2023 Annual Safe Schools Report.

The new law keeps all EOPs confidential. The 2023 statute includes a provision that protects all school security plans, procedures, reports, and other related documents as confidential and closed to public inspection.^G The original SAVE Act language, which remains unchanged in statute, requires “building-level emergency response plans to remain confidential” but also requires each district-level safety plan and a summary of each building-level emergency response plan to be available for public comment at least 30 days prior to their adoption by a school district.^H (This older language may be making a distinction between the three stipulated portions of the full “safety plan:” crisis intervention, emergency management, and emergency response, which remain in the 2023 revised language.)

Existing law also provides that

“any meeting concerning school security, the district-wide school safety plans, or the building-level school safety plans shall not be subject to the open meetings laws,”^I

but also that

“the district-wide and building-level plans may be adopted by the [district] only after at least one public hearing that provides for the participation of school personnel, parent, students, and any other interested parties.”^J

TDOE has stated that local school or charter governing boards can and should hold public comment sessions to allow the public to have input and provide useful information about what should be addressed in a safety plan prior to a closed meeting where the boards deliberate on and adopt safety plans/EOPs.

State officials review district and school EOPs. The new requirement for districts and charter schools to submit their EOPs annually, rather than every five years, will automatically change state and local officials’ review procedures. Although specific review requirements for parties receiving EOPs are not included in state law, past practice suggests that multiple state officials review both district- and building-level EOPs.^K

In recent years, when EOPs have been submitted on a rotating five-year cycle, every district EOP and at least 20 percent of the school EOPs were reviewed on the scheduled cycle by an interdepartmental state team including representatives of Tennessee departments of Education, Safety, Health, Mental Health, and Commerce and Insurance, and Tennessee Emergency Management Agency. TDOE staff reported that 500 EOPs had been reviewed in 2022-23, including half the district plans and 20 percent of school-level plans. TDOE indicates that as the new lead of the State-level School Safety Team, the Department of Safety will set the new parameters for EOP reviews. It also notes that the Department of Safety is hiring over 100 additional Homeland Security agents to assist with school safety, and TDOE is repurposing eight existing staff to support school safety efforts.

^G Public Chapter 367 (2023), section 18, to be codified in Tennessee Code Annotated 10-7-504(p).

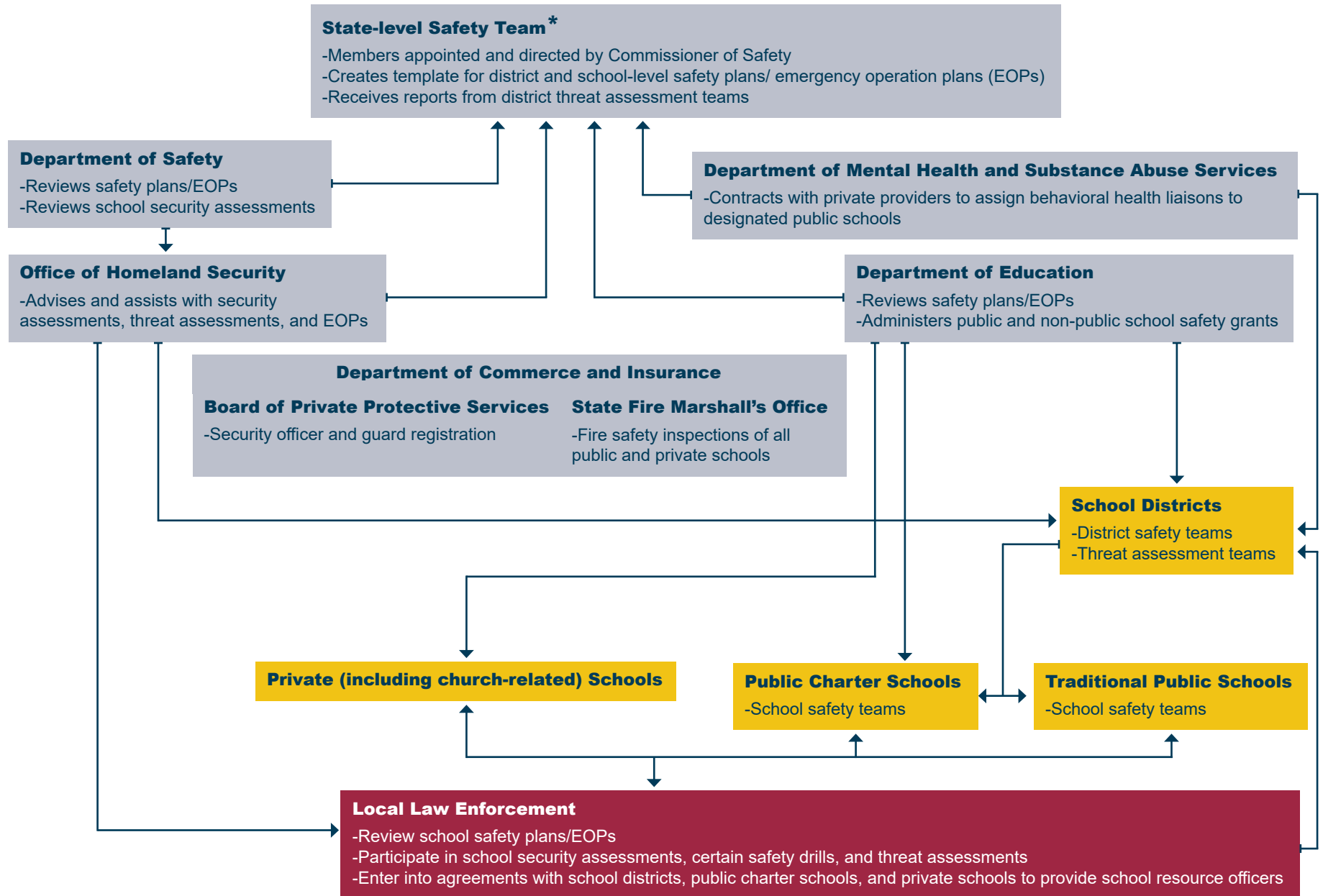
^H Tennessee Code Annotated 49-6-808 (a) and (c).

^I Tennessee Code Annotated 49-6-804(b) and revised in Public Chapter 367 (2023), section 5, referenced as a revision to TCA 49-6-804(c).

^J Tennessee Code Annotated 49-6-808(a).

^K District-level plans had been required to be submitted to TDOE and to the appropriate local law enforcement agencies, while building-level plans had been required to be submitted to Department of Safety and the appropriate local law enforcement agency. The 2023 revisions now require both district-level and building-level EOPs, as well as building floor plans, to all be submitted to both the Departments of Education and Safety as well as to local law enforcement.

Exhibit 1: State law directs multiple state and local organizations to be involved in school security



*Other state agencies statutorily required to be represented include the Department of Health, Department of Intellectual and Developmental Disabilities, Tennessee Bureau of Investigation, and State Board of Education.

Safety plans (EOPs) required for the new Public School Security Grants and TISA

District and charter schools must submit their district- and school-level EOPs as part of their application for the new one-time, state-funded Public School Security Grants and to meet requirements for receiving TISA base per-student funds. To meet the requirements for the Public School Security Grants (described on page 2), districts must show that they have submitted their now annually required district- and school-level EOPs, the previous year's safety drill logs, the school security assessment for all schools (including charters), and a list of safety and emergency contacts, as well as a description of how they plan to use the grant funds to meet needs identified by the school security assessments at both traditional and charter schools. (See more about school security assessments at page 10.)

When the TISA Act was passed in 2022 and folded the previously separate annual Safe Schools Grants into the base funding per student portion of the state school funding formula, the previous grant application requirements were retained in law through a requirement for an “annual school safety plan.”^L While districts applying for the former Safe Schools Grants had to describe how grant funds would be used to improve and support school safety, would align with the needs identified by the annual school security assessment, and would support any district-authorized charter schools, districts are now required to submit a “safety plan” to TDOE that describes how TISA funds will be used to improve and support school safety, meet the needs identified by the annual school security assessment, and support the safety needs of any authorized charter schools.^M The TISA Act does not specify when such plans should be submitted. The TISA safety plan requirements are virtually identical to the narrative description required in the application for the 2023-24 Public School Security Grants.

In another instance of overlapping requirements, TDOE notes that the district-level EOP (safety plan) required by the SAVE Act would also meet the TISA safety plan requirement to report per-student base funds used for school security. The law requires the TISA safety plans to be reviewed by TDOE in collaboration with the State-level School Safety Team, and although the SAVE Act does not specify state review of EOPs, past practice has included multi-departmental review by many of the same state departments that are represented on the State School Safety Team. TDOE indicated that as the state fully transitions to TISA funding in 2023-24, the requirement for detailing the use of TISA base funding for school security would become part of TISA accountability reporting.

New requirements for private school safety plans

A new provision requires private (including church-related) schools to adopt the same type of building-level school safety plans (EOPs) required for public schools that address crisis intervention, emergency response, and emergency management. The private schools are required to review their plans annually and share them with relevant law enforcement agencies by October 1, 2023, and each year thereafter. There is no requirement in law that the private schools must use the safety plan template developed by the State-level Safety Team.

^L Public Chapter 966 (2022), Section 61.

^M Although state law (TCA 49-6-4302(j)) requires districts to submit these safety plans to the Tennessee School Safety Center, the center is an outdated name no longer in use. In practice, the center comprises TDOE staff members assigned to school safety responsibilities within the department.

Changes related to school security assessments

The new law codifies requirements for school districts and charter schools to conduct annual school security assessments that identify security vulnerabilities. Two governors have directed that school security assessments be conducted annually, but that requirement has not been in statute until now.

School security assessments were first required not in law but through a directive of Governor Bill Haslam in March 2018. The Governor's directive for the statewide security review was the top priority identified by the school safety task force he appointed in the wake of the Parkland, Florida, school shooting. The security assessments were to be developed and implemented by the Department of Safety, in conjunction with TDOE and local school and law enforcement officials. Haslam's directive further indicated that school security risks were to be updated annually and that state funds for school safety, such as the annual Safe Schools Grants and one-time SRO grants awarded by TDOE, were used to meet identified risks.

School security assessments were adopted into law through legislation passed in 2019 and TDOE continued to implement the assessments as an annual requirement. Governor Bill Lee reinforced the need to continue the security assessments annually in his school safety executive order of June 2022 and called for more frequent reviews, including in-person verification by state officials that schools are making the security improvements identified by the assessments.

Completed assessments for 2023, which are considered sensitive information and not subject to public record requests, were due to state officials by June 9. TDOE and Department of Safety officials review all the security assessments and have committed to conducting site visits in at least one-third of the districts each year, focusing on priority needs for school security. The comprehensive assessments, which include a total of 232 standards, identify 81 priority standards.

Changes related to threat assessment teams

The law now requires, rather than simply allows, school districts to adopt policies for establishing threat assessment teams within the district, applicable to all public schools, including any authorized charter schools. The law also broadened threat assessment teams' reporting requirements to include state authorities—the Department of Safety, TDOE, and the members of the State-level Safety Team – in addition to the local board of education and director of schools. The Department of Safety will provide resources, assistance, and, as needed, leadership for threat assessment teams, with input from TDOE.

The purpose of threat assessment teams, first authorized in law in 2019, is to develop interventions that can be applied throughout a school district to manage reports of potential threats, prevent violence, and foster a safe, supportive, and effective school environment. The assessment teams are required to include school district staff and law enforcement personnel and may also include representatives from juvenile services, the local district attorney's office, mental health service providers, and the Department of Children's Services. Among a number of duties, the teams are to:

- obtain training from local law enforcement or mental health service providers on how to assess individuals who exhibit threatening or disruptive behavior and how to intervene with such individuals;
- conduct threat assessments based on dangerous or threatening behavior of individuals in the school, home, or community;

- establish procedures for district staff, students, and others to report threatening behavior;
- establish procedures for intervention, diversion, and de-escalation, including referrals to community services or healthcare providers, notification of parents, or notification of law enforcement and emergency medical services; and
- document behaviors or incidents deemed to pose a risk to school safety and any interventions.

Looking ahead – security elements in new school construction and renovation

Public schools, both traditional and charter, constructed or remodeled after July 1, 2023, must incorporate new security features specified in law. These features include:

- inside locks on each classroom door;
- clear, bullet-resistant or entry-resistant film on glass panels of each exterior door or basement level window;
- a camera system, accessible by a local law enforcement agency, that continuously monitors each entrance, hallway, and communal area in the school building during regular hours and during school-related activities on school grounds; and
- at least one secure vestibule that serves as the primary entrance to the school and contains two separate sets of doors, capable of being locked separately, through which people must pass to gain entrance.

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