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The Honorable Peter C. Deddeh
Presiding Judge/San Diego Superior Court
County of San Diego Hall of Justice
330 W. Broadway
San Diego, CA 92101-3830

RE: Grand Jury Report: "School Safety in San Diego County"

Dear Judge Deddeh,

This letter contains Sweetwater Union High School District's comments and responses to recommendations outlined in the 2018/2019 San Diego County Grand Jury Report, dated May 21, 2019, pursuant to Requirements and Instructions on page 11 of the report and in compliance with Penal Code §933.05.

Finding 01: Overall, the San Diego County Schools studied are prepared to handle many kinds of emergencies, including active shooter situations, due largely to mandates from the State.

The Sweetwater Union High School District agrees without comment.

Finding 02: Overall, law enforcement, first responders, parents and other stakeholders have shown interest to work cooperatively with San Diego County school studied in the prevention of possible active shooter incident.

The Sweetwater Union High School District (SUHSD) agrees with Finding 02.

- SUHSD schools benefit from outstanding partnerships with our local law enforcement partners. The district has formal funded SRO MOU's in place with CVPD, NCPD, SDSO Imperial Beach SRO and a strong working relationship with SDPD Southern Division JST Officers. All four of our local Fire Departments, CVFD, NCFD, SDFD and IBFD actively support school safety efforts.
- SUHSD schools benefit from outstanding partnerships with multiple federal local law enforcement partners from work with the Law Enforcement Coordination Center (LECC) to DHS, DEA and others. The Security Coordinator and Advisor is an active member of the local InfraGard chapter. Recently, SUHSD received the Federal Attorneys' "Excellence in the Pursuit of Justice" award for cross-border drug smuggling prevention efforts.
- As part of the SD County DA's effort to develop SD standardized protocol for targeted school violence prevention, response and recovery, upon invitation SUHSD helped shape the education sector's input and share experiences implementing items. The resulting protocol presented to all SD Country Superintendents and their teams presents a critical joint cooperation between federal law enforcement (LECC), county law enforcement, mental health (PERT) and education.
- SUHSD has formal partnership agreements with South Bay Community Services (SBSCS) that provide comprehensive student support, to include many aspects of student mental health and other

"Putting Students First"

Sweetwater Union High School District "programs and activities shall be free from discrimination, harassment, intimidation and bullying against an individual or a group based on age; gender, gender identity or expression, or genetic information; sex, actual or potential parental, family, or marital status that treats students differently on the basis of sex; race, color, religion, ancestry, national origin, ethnic group identification, physical or mental disability, sexual orientation, immigration status; the perception of one or more of such characteristics; or association with a person or group with one or more of these actual or perceived characteristics."

SUHSD Board Policy 0410

safety-related services. SBCS also helps support multiple local law enforcement agency juvenile diversion programs.

Finding 03: At the site level, there appears to be some lack of interactive collaboration with community stakeholders on the actual development of the plans.

The Sweetwater Union High School District (SUHSD) agrees with Finding 03 as a general characterization for San Diego County schools, but SUHSD has undertaken multiple collaborative efforts.

- Developing meaningful stakeholder engagement in all aspects of the organization is a priority for SUHSD, which is why the district and school sites engage stakeholders in the process of annually reviewing and revising their Comprehensive School Safety Plans. The process is interactive and authentic. Every SUHSD school site is required to have a student and parent representative on the school safety committee that helps define school safety priorities and goals.
- School site parent organizations vary in composition throughout the district, but most schools have active Parent Teacher Associations (PTAs), District English Learners Advisory Committee (DELAC) and District Parent Advisory Council (DPAC) (language acquisition stakeholders), and some have Culture and Climate groups—all who provide authentic feedback on comprehensive school safety.
- In Coordination with State and Federal Department, the district Security Coordinator and Advisor enjoys a strong relationship with the DELAC and DPAC parent teams.

Finding 04: The Grand Jury found that some of the schools reviewed had conducted a vulnerability study of their premises.

The Sweetwater Union High School District (SUHSD) disagrees wholly with Finding 04, as it relates to the schools within our district. Vulnerability assessments have been conducted for ALL SUHSD schools.

Finding 05: Valuable learning from the recent Florida and Texas shootings is not fully reflected yet in the existing CSSPs.

The Sweetwater Union High School District (SUHSD) agrees with Finding 05.

- It can take many months of study in the aftermath of an active shooter event before official findings and recommendations are published. The Marjory Stoneman Douglas High School Public Safety Commission’s initial report was published on January 2, 2019, and no official report has been released on the attack on Santa Fe High School in Texas.
- The SUHSD is committed to developing high quality emergency operation plans for active shooter events and works closely with police agencies and other stakeholder groups to update these plans as best practices emerge.
- SUHSD has established protocol recognized by this report as being firmly grounded in the most up-to-date research from FBI, DHS and other scholars and national subject matter experts. Moreover, guidance from National Association of School Psychologists (NASP) and School Resource Officers (NASRO) have been heavily utilized.

Finding 06: Overall, school districts in San Diego County indicated a more focused approach to active shooter response through their efforts to improve communication, add site safety precautions and adopt guidelines for Options-Based Responses in this year’s or next year’s Comprehensive School Safety Plans/Emergency Operations Plans.

Sweetwater Union High School District (SUHSD) agrees with Finding 06.

- SUHSD has made significant investments to prevent, respond to and recover from an active shooter event.
- District staff helped contribute to the San Diego County Office of Education’s (SDCOE) “Options-Based Response” Training of Trainers course. During 2013-2017, the SDCOE convened a small

work group to study extant research, guidance and best practices in an effort to develop guidance for options-based protocol. SUHSD played a key role throughout.

- SUHSD’s Security Work Group will host its eighth annual two full-day training sessions mandated for all school safety committees. A significant portion of the training is centered on options-based responses to not only active shooter threats, but also many other more common threats to schools, e.g. suspected weapons possession, bomb threats, etc.
- All schools participate in two lockdown drills per year.
- District and site Mental Health Crisis Intervention Teams have been trained by SDCOE staff using the National Association of School Psychologists’ PREPaRE model.

Finding 07: All San Diego County Schools in the Grand Jury study claimed to have conducted or have scheduled drills within the current school year on emergency procedures directed towards intruders on campus, but not specifically armed assailants.

Sweetwater Union High School District (SUHSD) agrees with Finding 07. Since 2013, all SUHSD schools have been required to conduct at least two lockdown drills annually in addition to other required security and safety drills, e.g. Secure Campus, Clear Room, Earthquake and Fire.

Finding 08: Drills (conducted or planned) center mainly on the presentation of procedures but are progressing toward becoming more realistic and dynamic, which helps create a “mental model” for preconditioning staff and students to act with immediacy.

Sweetwater Union High School District (SUHSD) disagrees partially with Finding 08.

- It may be read to imply that “realistic and dynamic” drills are appropriate for ALL students. However, in their “Best Practice Considerations for Schools in Active Shooter and Other Armed Assailant Drills” the National Association of School Psychologists and the National Association of School Resource Officers offer the following guidance regarding drill intensity: “*For some participants, this intense exposure and practice may empower them with experience, options, and a sense of control. For others, this type of drill may be emotionally traumatic (Frosch, 2014). (p.4)*”
- California Education Code gives local school site councils the responsibility and authority to revise and approve the Comprehensive School Safety Plans (and the Emergency Operations Plans included therein).
- The SUHSD Security Work Group, comprised of an interdisciplinary team of educators, psychologists, and district officials, prepared guidance set out to interpret the guidance from NASP and NASRO. District guidance was prepared to help school teams structure training and drill progression from basic, intermediate, to advanced skills across the secondary ages. Additional precautions were offered for students with special needs or those for whom more stressful training may be inappropriate. These concepts were shared with the SDCOE work group.
- Decisions about the type and intensity of emergency drills are best evaluated at the local level with informed district guidance to help move progressively from simple to more stimulating options-based drill formats, in a developmentally appropriate manner.
- SUHSD believes that training elements that may be highly appropriate for tactical and psychological preparation of law enforcement and some adults such as gunfire simulation, wound simulation, for example have less objective-oriented purpose and are even less developmentally appropriate for students. Further distinctions can be drawn between what is appropriate for staff versus student training. For example, after several years of gradually building capacity district-wide with options-based approaches to the “Run” and “Hide” elements beyond standard lockdown, we only recently felt prepared to provide formal practical instruction in the “fight” piece in 2018 (only for adults in SUHSD).

- As with any sound curricular design, SUHSD believes that safety training decisions are ideally accompanied by considerations of whether the skill is beginning, intermediate, or advanced. Furthermore, consideration should be made whether the training is intended to build awareness, intermediate or even advanced individual proficiency and/or organizational capacity. Lastly, general perishability of the skillset should be considered. Safety training is most efficiently and effectively approached with a general progression of skills in mind. Is this a skill all members must know? (E.g. recognize attack indications and to be able to move to safety as an individual or a group.) Districts should avoid expending precious resources of time and money on skillsets that are advanced, taught without key foundation skills, or that are highly perishable. Such items may be inadvertently conflated with being “realistic” without offering substantive training value.
- Lastly, SUHSD believes that all districts should be wary of dramatic, made-for-media coverage, full-scale exercises (sometimes suggested by law enforcement who are under community pressure) that tend to use staff and students as static actors, with the major training benefit for law enforcement. If conducting these types of “realistic” full-scale exercises, the specific training objectives for ALL participants should be clearly delineated in the planning sessions. Scripted events are less valuable than being more engaged in carefully structured options-based scenarios that encourage more opportunities for thinking under pressure for ALL participants.

Finding 09: As a note of recognition, Sweetwater Union High School District has gone above and beyond state requirements for safety training by demonstrating excellent and thorough levels of preparation.

The Sweetwater Union High School District (SUHSD) agrees with Finding 09. Sweetwater Union High School District is honored to be recognized by the Grand Jury.

Finding 10: Funding for active shooter response and preparedness is given high priority for some districts.

The Sweetwater Union High School District (SUHSD) agrees with Finding 10.

Finding 11: Before and after school programs need to be better addressed in safety plans.

The Sweetwater Union High School District (SUHSD) agrees with Finding 11.

- Since 2017, emphasis has been placed on standardizing and building capacity in After School Programs (ASP’s) comprehensive school safety.
- ASP’s have been equipped with the radios that share compatible programming and emergency all-call features with the main sites.
- ASP staff from South Bay Community Services, YMCA and ARC attended a 2-hour comprehensive safety training tailored to the ASP environments.
- Coordinated with the Assistant Principal responsible for campus safety and security, ASP staff develop a structured emergency call list specific to their site and program. As of 2019-20, this is embedded within the larger site CSSP.

Finding 12: Many districts expressed a need to train all adults on campus in safety procedures.

The Sweetwater Union High School District (SUHSD) agrees with Finding 12.

Recommendation 19-01: Increase the priority of funding in school budgets for training, equipment and infrastructure improvements to handle active shooter crisis as a matter of security for staff and student safety.

Recommendation 19-01 has been implemented with multiple projects completed and some currently in varied stages of implementation. The Sweetwater Union High School District (SUHSD) has identified

priorities and timelines for improving school safety. To date, the following projects have been completed or are nearing completion:

- The district two-way radio system has been replaced with a modern FCC-licensed, digital, encrypted system for both local school networks, and a regional wide-area network. The SRO's and JST's have been issued command radios with full ICS programming. The District-wide emergency network is monitored throughout business hours by all schools and at multiple key district departments. District wide radio drills are conducted to ensure efficient and professional routine and emergency use. ICS command radios with master programming needed to communicate with key channels of all school sites are assigned to district personnel with key ICS roles. School conduct site-wide emergency radio drills to ensure speed and efficiency of command, control and communication during emergencies.
- A Phone-to-PA project connected all school phones to the school PA in order to provide multiple options for administration and designees to provide alerts and follow-on directions during an emergency.
- Internally locking door hardware is being retrofitted by the locksmith department, with approximately 80% of classrooms now covered (per Sandy Hook Report recommendation).
- Electronic Radio Frequency ID (RFID) access control lockets are being piloted at the administrative center and a large high school. Video systems are being piloted at two schools and administrative center locations to test and evaluate analytic camera capabilities.
- Vestibules have been installed at the administrative center to manage access control to HR and Student Support Services.
- ICS load-out kits have been purchased and assembled to help equip a district team to support a remote reunification effort for a site that must be bussed to an alternate location for reunification.
- Raptor electronic visitor screening systems have been installed and implemented at all district middle schools and one pilot high school.
- Classroom lockdown supply kits have been developed and distributed to all schools.
- Prop DD Bond was passed with 69% approval with the following language specific to campus safety infrastructure upgrades:
 - Acquire and install classroom intrusion alarms, video surveillance cameras, safety locks on classroom doors, fencing, gates, related safety infrastructure, and exterior lighting for student safety.
 - Upgrade emergency communications, marquees, related infrastructure, and technology backup systems.
- A management position was created for a Security Coordinator and Advisor.

Recommendation 19-02: Explore alternate or creative sources of funding to supplement the school's needs to enhance safety measures regarding active shooter situations, including possible grants or community fund-raising efforts.

Recommendation 19-02 has been implemented. The district has secured additional resources to support school safety initiatives:

- In partnership with CVPD and CVESD, SUHSD has applied for a DOJ Community Oriented Policing grant intended to fund new video systems that can be federated (connected) to CVPD. This system will use the same Video Management Software (VMS) that is used by Sheriff, SDPD, and Harbor Police.
- The Classroom emergency bucket project outfitted all schools with buckets stocked with a list of emergency essential developed by the school nurse cadre. In addition to these standardized contents, schools are encouraged to utilize varied funding sources, to include donations, to augment.
- The district also actively searches for grant and partnership opportunities to supplement our investment in school safety.

Recommendation 19-03: Conduct vulnerability studies at all school and use this data to guide the development of the CSSP and EOP.

Recommendation 19-03 has been implemented. Since 2013, the district has conducted vulnerability assessments on all schools using three different tools:

- Active shooter threat-specific vulnerability studies were conducted by the district in conjunction with SRO's in 2014-15. In addition to helping guide internal protocol (e.g. identifying hazard and safe areas, etc.), these studies lead to the proposal and implementation of many of the items listed in response to recommendation 19-01 above.
- REMS TA: The second layer of studies utilized a simple format from U.S. Department of Education's Office of Safe and Supportive Schools Readiness and Emergency Management for Schools Technical Assistance (REMS TA) Center that was focused on access management. For this assessment, site teams were trained in 2017 and guided through a process of self-assessment. These results helped guide site priorities and revision of more specific site access control protocol.
- CPTED: In 2018, site teams were trained in a more comprehensive Crime Prevention Through Environmental Design (CPTED) model structured from the Sandy Hook Final Report, which goes beyond the active shooter threat. These more exhaustive self-assessments will help contextualize work with Prop DD-funded architects and projects.

Recommendation 19-04: Provide more safety precautions against active shooters, including threat awareness training/reporting, and site physical improvements.

Recommendation 19-04 has been implemented.

- With the assistance of SDCOE, Sweetwater Union High School District (SUHSD) has trained Student Threat Assessment Teams for each of our sites for the past six years. The last two years have averaged between 60-70 student threat assessments per year across the district.
- The district helps track and ensure coordination between site, law enforcement, Student Support Services and Special Services as applicable for managing all student threat cases.
- The district regularly convenes a threat assessment review team to study cases deemed most high-risk to ensure continuity of post-assessment steps.
- SUHSD has consulted with certified Threat Assessment Professionals to assess and manage risk in non-student cases.
- SUHSD has developed a strong working relationship with key members of the San Diego Local Law Enforcement Coordination Center pertaining to school threats as well as the San Diego County School Threat Assessment Team.

Recommendation 19-05: Monitor individual school's planning meetings to develop the CSSP and EOP to ensure collaboration of multi-disciplinary partners (staff, parents, students, first responders, fire department and law enforcement, community agencies) at the local school level.

Recommendation 19-05 has been implemented.

- The district develops and promulgates the master standardized CSSP templates via a Document Tracking System. The district coordinates the development and revision of the tactical protocol contents with four local law enforcement agencies. In addition to the more boilerplate annual revisions, the CSSP also provides areas for sites to define goals and implementation plans.
- School safety team meetings are scheduled on a master online calendar for all schools that is accessible to both district and administrators from other schools. Meeting agendas are linked to the dates. This system helps Assistant Principals stay organized, encourages forward progress and allows AP's to share and compare as larger collegial team.
- Roles and responsibilities for district and site administrators with regard to the CSSP are clarified.

- Specific benchmarks and dates are provided when all CSSP's are reviewed by the district well ahead of the board approval deadline. The CSSP's are all critiqued by the district with specific feedback provided back to each AP.
- Composition of school safety teams and roles of stakeholder groups are per CA Ed Code. In addition to holding scheduled team meetings, AP's are encouraged to involve team members in site safety and security discussions and decisions as appropriate. This helps foster trust, productive bargaining unit representation and an authentic sense of ownership for all stakeholder.

Recommendation 19-06: Include "Active Shooter" response language in the school's Comprehensive School Safety Plan and dedicated sections in the Emergency Operations Plans.

Recommendation 19-06 has been implemented. All Sweetwater Union High School District school site CSSP's include emergency operations plans specific to active shooter prevention, mitigation, response, and recovery.

Recommendation 19-07: Promote the use of tip hotlines and tip apps by students and parents.

Recommendation 19-07 has been implemented. The district and all school sites actively promote the use of Students Speaking Out P3 Tips app, text and associated hotline. The app is pushed out to all district devices. The CVPD Chief of Police and SRO's collaborated with students to produce a well-produced video. Posters promote download and use of app, school site parent communications and newsletters have promoted download and use. In 2019-20, schools have begun to print the text number, website and P3 App on back of student ID cards.

Recommendation 19-08: Include substitute teachers and all other adult workers in the training and practice provided to regular staff on active shooter awareness and responses specific to each school.

Recommendation 19-08 has not yet been implemented but will be implemented in the future. Not later than Aug. 15, 2020, the district will implement a system to train all adults (including substitute and contracted service providers) who work with students on our campuses in the basics of targeted violence prevention and active shooter response.

Recommendation 19-09: Conduct active shooter drills with staff that are dynamic and produce "immediacy" of response consistent with the school's approved safety plan.

Recommendation 19-09 has been implemented.

- Sweetwater Union High School District (SUHSD) works closely with CVPD, SDPD, NCPD and SDSO Imperial Beach to plan active shooter drills for all sites. The drills are options-based and prepare staff to lead students through a quick evaluation of their response options (Run, Hide or Fight) and choose the response that is best suited to protect them. Training focuses on developing heightened situational awareness and a safety mindset. This training involves instruction, followed by clarification of general scenario roles, boundaries, limitations and safety.
- All district's site safety and security teams are required to attend an annual Security Work Group Training, now entering its eighth iteration, where this material is covered in depth in both presentation and mixed practical scenarios. The training day involves many topics aside from active shooter response in an effort to be more comprehensive in nature. The segments on active shooter response are designed to be intense, exciting and ultimately empowering. Almost half of the SUHSD principals have now elected to dedicate up to two hours of staff training to bring this more practical application experience to all their employees back at the sites. These trainings are conducted by the district and SRO's.

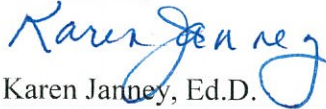
Recommendation 19-10: Use age-appropriate training methods in conducting lockdown and active shooter drills with students.

Recommendation 19-10 has been implemented. We strongly believe that practical training must be developmentally appropriate, progressive, objective-oriented and audience-specific in order to be safe and effective. Therefore, when planning options-based active shooter drills, the Sweetwater Union High School District schools follow district guidance derived and interpreted from “Best Practice Considerations for Schools in Active Shooter and Other Armed Assailant Drills”, published jointly by the National Association of School Psychologists and the National Association of School Resource Officers.

Recommendation 19-11: Coordinate detailed emergency plans for school programs held on campus outside of normal school hours, inform all participants and involve the community’s support.

Recommendation 19-11 has been implemented. Safety plans for all Sweetwater Union High School District schools include plans specifically designed for our after school programs. After school program staff from our South Bay Community Service, ARC and YMCA providers have trained on emergency both routine and emergency procedures. Please see the supporting details provided for Finding 11 above that are also relevant to this recommendation.

Respectfully,



Karen Jarney, Ed.D.
Superintendent