



**STATE OF WISCONSIN
DEPARTMENT OF JUSTICE**

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SENT VIA EMAIL

The Honorable Robert Cowles
Co-chair, Joint Legislative Audit Committee
Sen.Cowles@legis.wisconsin.gov

The Honorable Samantha Kerkman
Co-chair, Joint Legislative Audit Committee
Rep.Kerkman@legis.wisconsin.gov

Joe Chrisman
State Auditor, Joint Legislative Audit Committee
Joe.Chrisman@legis.wisconsin.gov

Re: Update on the Office of School Safety audit recommendation

Dear Senator Cowles, Representative Kerkman, and Mr. Chrisman:

In April 2019, the Legislative Audit Bureau (LAB) began its audit of the Wisconsin Department of Justice (DOJ) Office of School Safety's (OSS) administration of school safety grants and collection of school safety plans. The audit was completed in fall 2019, and the final report was submitted to the Joint Legislative Audit Committee in December 2019 (Report 19-28). As part of the report, LAB recommended that DOJ "use the results of [its] surveys of school administrators and local law enforcement agencies to consider ways to provide school districts and schools with additional training and support for school safety issues and report to the Joint Legislative Audit Committee by April 24, 2020, on its efforts to implement this recommendation."

The following is a summary of OSS's efforts to date to implement strategies to address the opportunities for improvement identified in the LAB surveys. To be clear, DOJ views these strategies as a starting point and will continue to look for additional opportunities to work collaboratively with our partners, with the goal of having the safest schools in the country.

Assistance with School Safety Plans

The first survey questions addressed in the LAB report pertained to schools' satisfaction with the assistance they received in the development of their required school safety plans. Among schools that responded, 76 percent of public schools and 78 percent of private schools were satisfied with OSS.

In order to assist schools prior to the first deadline for submission of school safety plans to OSS in January 2019, OSS, on its website, posted several reference documents and identified organizations that could provide support. In light of the survey results LAB received, OSS determined that it should take a more proactive approach regarding assistance with school safety plans moving forward.

To that end, OSS plans to employ four limited term employee (LTE) auditors beginning in April 2021. These auditors will be responsible for encouraging the timely submission of statutorily required documents, including school safety plans, reviewing the content of submitted documents for quality, and providing one-on-one training and technical assistance to schools whose plans do not meet best practice standards.

Because of the impact that the public health crisis resulting from the coronavirus outbreak has had on OSS's operations, however, five new staff members who began work on March 16, 2020 were not trained for the positions for which they were originally hired and instead were trained to review and provide feedback on school safety plans. OSS anticipates that a review of all submitted school safety plans will be completed next month and that feedback will be provided to schools by September 2020.

School Safety Grants

The LAB also surveyed schools regarding their satisfaction with the administration of the school safety grants. With respect to the first round of grants, a number of responding public and private schools were not satisfied with the timing of the grant announcement/application, the amount of effort required to receive the grant, and the expenditures that were approved for grant funding. In round one, dissatisfaction scores ranged from approximately 23 percent to 46 percent across the three categories for both public and private schools. Satisfaction surveys for the second round of grant funding improved slightly, with a range of dissatisfaction scores of approximately 24 percent to 37 percent across the same categories for both public and private schools.

a. Grant Timing

The timing of the school safety grant application process was a product of when 2017 Wisconsin Act 143 was enacted (March 26, 2018). Since OSS received LAB's report, OSS has been more mindful of the timing of various grant deadlines for schools and has pushed several back from August 31, 2020, to December 31, 2020, due to the coronavirus pandemic. OSS has also pushed back the deadline for the completion of all training requirements for the second round of school safety grants from August 31, 2020, to December 31, 2020.

b. Effort Required to Receive Grant

OSS currently uses the grants management system E-Grants. This system, which is used by multiple divisions and offices at DOJ responsible for grant administration, is compliant with all state and federal reporting requirements. Unfortunately, this program may not have been used by all participating schools to apply for grants in the past, and as such, some schools may have had to learn the E-Grants process while completing their school safety grant applications. OSS recognizes that this may be an added complication for some grant applicants, but it is unable to change its' grant management software at the current time.

c. Expenditures Approved for Grant Funding

All approved school safety grant expenditures must have a direct nexus to the safety of a school building or students/school staff. Approved expenditures include facility improvements, school safety training, social and emotional learning programs, suicide prevention programs, and any other expenditure that have a nexus to school safety. Expenditures that are not eligible for reimbursement include bulletproof glass, any item that would violate building/fire codes, any item that would violate the Americans with Disabilities Act, programs that are not peer-reviewed or evidence-based, and travel outside of the State of Wisconsin without prior approval.

School Safety Training

The second round of school safety grant funding included a requirement that 10 percent of all full-time school staff attend an adolescent mental health training that includes verbal de-escalation skills. In addition, all round 2 grant recipients are required to have a School Safety Intervention Team (SSIT) or Threat Assessment

Team (TAT) in each school building, and there must be one person on each SSIT/TAT that had completed OSS's Basic Threat Assessment Team Course. Most survey respondents were satisfied with both the adolescent mental health training and the threat assessment team training.

For the adolescent mental health training, OSS recommended the curriculum developed by the Center for Youth Opportunity and Justice (OSS did not provide this training directly). Seventy-four percent of public school and 88 percent of private school survey respondents were satisfied with the course. Schools also can use other curricula if they provide proof that all required topics will be covered.

The Basic Threat Assessment Team Course was authored by OSS Director Kristen Devitt and is delivered by OSS staff around the state at no cost to schools. More than 80 percent of public and private school survey respondents reported that they were satisfied with this training.

Some of the survey participants believed the trainings were redundant, not conveniently located, and/or not conveniently scheduled. Both trainings were required to be held within a two-year period and could be hosted by schools located anywhere in the state. The trainings were scheduled on a first-come, first-served basis, so attendees that did not register early in some cases found that the courses closest to them were full. OSS anticipated this issue and attempted to minimize inconvenience by allowing schools to utilize school safety grant funding to pay for travel, lodging, and substitute teachers.

In response to the concerns raised by survey respondents, OSS has scheduled additional trainings in a variety of locations around the state, and it regularly checks its compliance lists to determine if there is a part of the state in which more trainings should be scheduled. OSS has attempted to reduce the potential for training redundancy by allowing schools to deliver an alternative to the adolescent mental health training if they believe an alternative would better fit the training needs of their staff. OSS has also allowed schools to submit documentation as evidence of having already completed training with similar content.

School Safety Needs

Eighty-one percent of public school and 69 percent of private school survey respondents indicated that they still have unmet school safety needs. Identified unmet needs include:

- Facility improvements
- School Resource Officers (SROs)
- Communication devices
- School safety training
- Access to mental health services

OSS takes these concerns seriously and continues to search for funding opportunities to address unmet school safety needs. In addition, OSS has programs in development that will assist schools in addressing some of the unmet needs they identified.

OSS created a School Resource Officer Committee that began meeting in fall 2019. This group is developing an SRO Program Toolbox that will include guidance and document templates to help schools and law enforcement work together to develop SRO programs that follow state and national best practices. OSS has also set aside \$100,000 in school safety grant funds to train approximately 200 SROs.

OSS has used guidance from the Department of Homeland Security to develop a survey for School Safety Coordinators. Survey responses will be submitted anonymously and provide OSS with valuable information regarding what facility needs are unmet and on what best practices additional training is needed, as well as an overall measure of the perception of school safety in Wisconsin from the professionals who manage it daily. OSS has been working with the Wisconsin School Safety Coordinators Association in the development, review, and delivery of this survey.

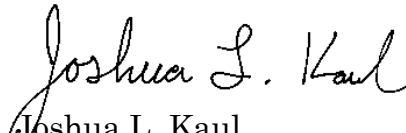
OSS also will be providing a minimum of \$30,000 each to 40 schools that volunteer to take part in the Wisconsin School Threat Assessment Protocol (STAP) Validation Study. These funds will be utilized for targeted interventions for students who are identified by the STAP as having a medium or high risk of behaving violently. Additionally, OSS will be allocating more than \$400,000 in federal grant funds to peer-to-peer safety education programs, including suicide prevention and mental health awareness.

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DOJ appreciates the opportunity to update the Joint Legislative Audit Committee on the important work being doing by OSS. DOJ and OSS will continue to look for opportunities to engage the numerous partners responsible for keeping our schools safe. DOJ and OSS also look forward to working collaboratively with the Legislature to identify additional resources that could be utilized to help OSS as it continues to pursue its mission.

Sincerely,


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Attorney General

JLK:CJM:alm

Cc: Tami Rongstad, Committee Clerk, Joint Legislative Audit Committee
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