



Rules for Active Shooter Drills and Exercises in Schools Should Incorporate Best Practices for Student Safety and Positive School Climates

IDRA public comments on proposed amendment to 19 TAC §103.1209 concerning mandatory school drills, related to implementing Senate Bill 168 (87R).

Submitted to the Texas Education Agency, March 3, 2022

Dear Commissioner Morath and Texas Education Agency Staff:

My name is Dr. Chloe Latham Sikes, and I serve as the Deputy Director of Policy at IDRA (Intercultural Development Research Association), an independent, non-partisan, education non-profit committed to achieving equal educational opportunity for every child through strong public schools that prepare all students to access and succeed in college.

Students learn best in healthy, supportive school climates. Creating safe schools for students to learn, thrive, and succeed should be a top priority for state leaders. Yet, some approaches to make schools safer can do the opposite if they instill fear and psychological trauma and are not appropriately mediated by mental health professionals or accompanied by culturally-sustaining school programs. Active shooter drills and exercises can make schools feel less safe, and in turn, hurt students (Huskey & Connell, 2021), particularly if they include active shooter simulations that involve student participation. The proposed rules should more explicitly account for best practices in mandatory drills and exercises related to active shootings, and promote evidence-based practices that build positive school climates.

Recommendations

These recommendations echo those made by the Sandy Hook Promise organization and relate to **§103.1209 (d) Best practices for conducting drills and exercises.**

- Best practices should embody approaches to student/staff wellness and safety that are developmentally and age-appropriate, trauma-informed, and evidence-based.
- Schools should be required to involve school-based mental health professionals prior, during, and after completion of drills and exercises.
- Schools should be required to designate a reasonable amount of time following a drill or exercise to allow for postvention services to mitigate negative mental health impacts on students and staff.
- Though the proposed rules defer to guidance by the Texas School Safety Center (TXSSC) to exclude students from active shooter simulations, we recommend this be made explicit in the amended rules for mandatory drills and exercises. Students should not be present

or near the school campus for active shooter simulations or any other live simulations of an actual shooting incident.

- Data tracked on the efficacy and impacts of drills and exercises should be reviewed annually, then be used to inform and update future content.

In addition, IDRA recommends the Agency promote evidence-based practices that create positive school climates to address the needs of all adults and students on the campus, without relying on potentially trauma-inducing drills or simulations, punishments or criminalization of students. Positive school climates promote students' safety and civil rights, without racial, gender or cultural biases, and with close attention to advancing equitable educational opportunities. Culturally-sustaining instruction and curriculum promote educational equity in schools by uplifting diverse perspectives, promoting racial and gender inclusivity that welcomes all students, and by encouraging student and family engagement in schools.

As the TEA and local education agencies consider implementing SB 168, they should also plan to expand the use of effective programs for student safety, including restorative practices and social emotional learning, and increase the presence of trained mental and behavioral health professionals like counselors and social workers (IDRA, 2021).

IDRA is available for any questions or further resources that we can provide. Thank you for your consideration. For more information, please contact Chloe Latham Sikes, Ph.D., IDRA Deputy Director of Policy, at chloe.sikes@idra.org.

References

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