



MANDATORY SCHOOL DRILLS AND ACTIVE THREAT EXERCISES

The Texas State Teachers Association offers the following comments to Proposed Amendment to 19 TAC Chapter 103, Health and Safety, Subchapter CC, Commissioner's Rules Concerning Safe Schools, §103.1209, Mandatory School Drills, §103.1211, Active Threat Exercises

Senate Bill 168, authored by Senator Blanco and signed into law June 14, 2021, requires school districts to adopt trauma-informed methods and policies regarding active shooter drills and exercises. The Texas State Teachers Association supported this legislation as an excellent first step to providing the needed guardrails for mandatory school drills in a way that centers the mental health and well-being of children. Since the filing of SB 168, we have continued to advocate for policies that will reinforce student and teacher protections against trauma-inducing events such as active shooter simulations. **TSTA supports the proposed amendments regarding mandatory school drills and active threat exercises because:**

- **student participation is explicitly discouraged;**
- **all participants – students and staff alike – must opt in, not opt out; and**
- **exercise participants are permitted to withdraw from the exercise at any time.**

The law permits schools systems to conduct active threat exercises, which could include an active shooter simulation or a live simulation that mimics or appears to be an actual shooting incident. While TSTA does not categorically reject active shooter drills, there is little evidence to demonstrate that active shooter drills with children are effective at saving lives in an emergency, and there is ample evidence to suggest that they can be more dangerous than beneficial. According to best practice recommendations put forth by trauma experts such as those suggested by the National Association of School Psychologists, exposing children to simulated shootings will negatively impact participants' mental health.¹ Experts tell us that simulations are fear-inducing and will cause anxiety because students are often unable to tell that a simulation is not a real threat.

TSTA has testified on multiple occasions and submitted rule comments concerning student and staff involvement in active threat exercises, and we believe that the proposed rulemaking has resolved our concerns. Though we would prefer all students be prohibited from participating in an active shooter drill, we appreciate maintaining local control while explicitly discouraging student participation and setting age limits. We have also advocated for the right of students and staff to opt out, so we fully support that the agency went a step farther in requiring participant opt-in. Finally, we support the requirement that the exercise allow for any participant to withdraw at any time. This exercise may be fear-inducing even to someone who wasn't expecting to be afraid, and we agree that rule must recognize this possibility.

Educators' number one priority is ensuring student safety and well-being, and TSTA continues to advocate for a multi-pronged approach to keeping schools and students safe. This includes providing a safe and secure learning environment for all students, increasing access to mental health services, and taking meaningful action on gun violence prevention. TSTA supports readying school systems for unanticipated emergencies through safety exercises and drills, but it is critical that our efforts center the mental health and well-being of children. We applaud the agency for proposing rules that demonstrate this commitment to Texas students.

¹ <https://www.nasponline.org/resources-and-publications/resources-and-podcasts/school-safety-and-crisis/systems-level-prevention/best-practice-considerations-for-armed-assailant-drills-in-schools>