

# PERFORMANCE AUDIT



Office of the  
Washington  
State Auditor  
Pat McCarthy

## Opportunities to improve school safety planning

Following up on selected issues from the 2019 report

April 24, 2023

Report Number: [1032451](#)

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## State Auditor’s Office contacts

### State Auditor Pat McCarthy

564-999-0801, [Pat.McCarthy@sao.wa.gov](mailto:Pat.McCarthy@sao.wa.gov)

### Scott Frank – Director of Performance and IT Audit

564-999-0809, [Scott.Frank@sao.wa.gov](mailto:Scott.Frank@sao.wa.gov)

### Justin Stowe – Assistant Director for Performance Audit

564-201-2970, [Justin.Stowe@sao.wa.gov](mailto:Justin.Stowe@sao.wa.gov)

### Tania Fleming – Principal Performance Auditor

564-999-0823, [Tania.Fleming@sao.wa.gov](mailto:Tania.Fleming@sao.wa.gov)

### Holland Kitchell – Lead Performance Auditor

564-999-0842, [Holland.Kitchell@sao.wa.gov](mailto:Holland.Kitchell@sao.wa.gov)

### Kathleen Cooper – Director of Communications

564-999-0800, [Kathleen.Cooper@sao.wa.gov](mailto:Kathleen.Cooper@sao.wa.gov)

## To request public records

### Public Records Officer

564-999-0918, [PublicRecords@sao.wa.gov](mailto:PublicRecords@sao.wa.gov)

## Americans with Disabilities

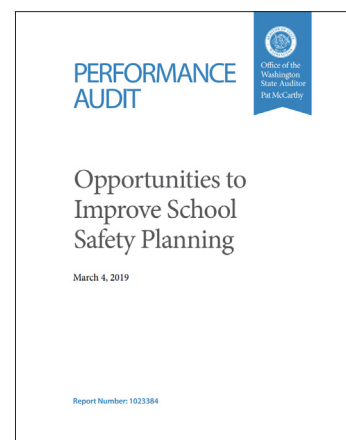
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# State Auditor's Conclusion

This performance audit represents our Office's commitment to following up on issues of deep public interest. This short-form audit report meets the same rigorous standards we apply to all our audits, but is designed to be laser-focused on key issues and be released to the public more quickly.

In this case, we checked back in with the state's Educational Service Districts (ESDs) to see whether and how they have followed key recommendations from our March 2019 audit: *Opportunities to Improve School Safety Planning* (see sidebar).

We found that since the earlier audit, each of the nine ESDs has established a regional school safety center; all of them also provide training, resources and consultation to districts on school safety issues. All ESDs met most required behavioral health services for their school districts, with some taking additional steps. However, state law also requires all ESDs to provide training and other activities to help school districts learn how to bill Medicaid for eligible behavioral health services. We found only two ESDs did so on a regular basis. We offer recommendations on this issue.



Read this report on our website at: <https://portal.sao.wa.gov/ReportSearch/Home/ViewReportFile?arn=1023384&isFinding=false&sp=false>

# Background

## School safety and student well-being are ongoing concerns statewide

School safety planning is an area of ongoing concern due to both an increase in mass shootings in schools nationwide and the threat of regional natural disasters. As of August 2022, the advocacy group Everytown for Gun Safety identified 22 shootings on school grounds in Washington since 2013, resulting in 10 deaths and 14 injuries. In addition, Washington's schools are at risk from various natural disasters inherent to the state, such as wildfires and earthquakes. These issues make effective school safety planning necessary to support students' sense of well-being as well as the physical safety of students and staff alike.

While school safety planning in Washington has traditionally focused on addressing emergencies like natural disasters, in recent years the scope has expanded to include other aspects of safety, including mental health supports. Federal guidance suggests that a positive school environment that provides students with ready access to emotional and behavioral supports can affect the capacity of students and staff to prevent, respond to, and recover from emergencies.

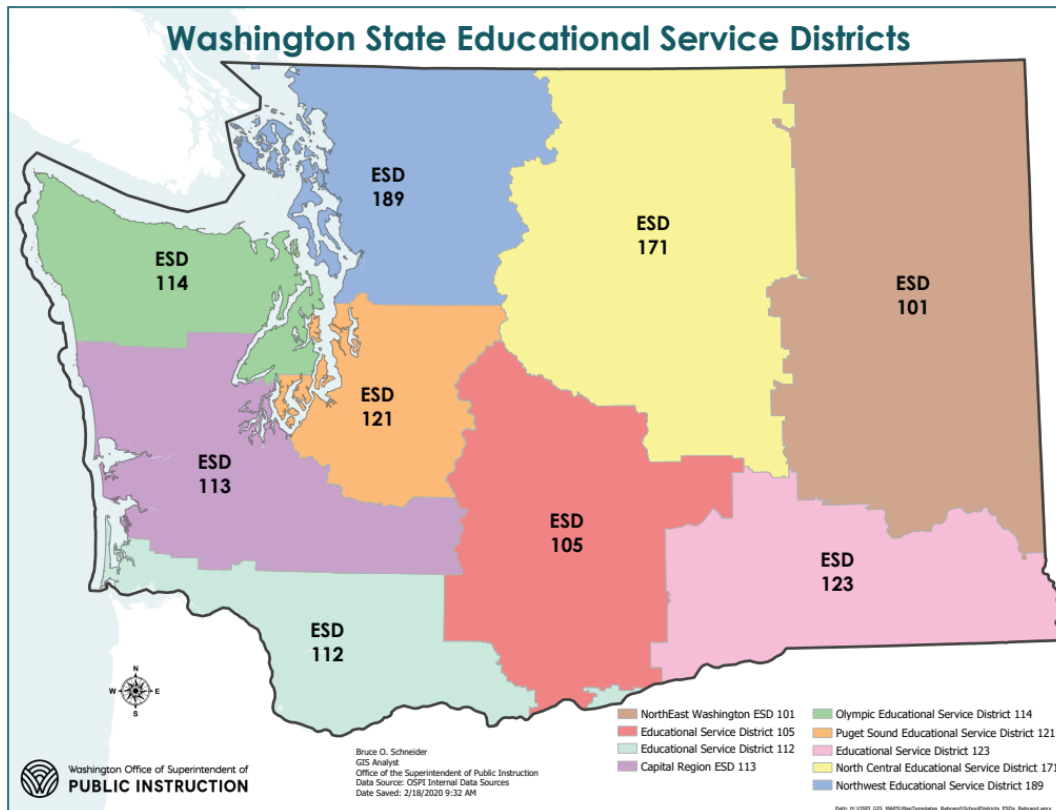
However, without resources and staff dedicated to school safety planning, this essential service area must compete with school districts' many other priorities. School and district leaders may be more inclined to focus on issues they hear about regularly, so preparing for a hypothetical emergency might be overlooked if it is considered less urgent.

## The Legislature established a regional model to enhance school safety statewide

In 2019, our Office published a performance audit titled Opportunities to Improve School Safety Planning (see sidebar). The audit identified gaps in school districts' safety plans as well as ways some districts had improved their school safety planning. Districts that had addressed gaps in their safety plans cited "coordination between stakeholders" as key to improving school safety preparedness. The state's nine regional Educational Service Districts (ESDs) were recognized as a helpful mechanism for improving coordination because they can bring together resources

from other school districts, establish consistency, save schools money on training, and act as a support and accountability network. The map in **Exhibit 1** shows the current boundaries of the nine ESD service areas.

**Exhibit 1** – Map of Educational Service Districts' service areas



Source: Office of Superintendent of Public Instruction.

Around the time our audit was published, the Legislature passed Second Substitute House Bill 1216, which required that the state's nine ESDs establish regional school safety centers. These safety centers were intended to provide administrative support to school districts and their students for three safety-related topics:

- Threat assessments
- Emergency operations planning
- Behavioral health

The Legislature provided nearly \$1.3 million in funding for the nine ESDs in 2019 and 2020 to establish the regional school safety centers. In 2021, the Legislature increased funding to include three staff members for each ESD's safety center.

## This audit examined progress made in enhancing school safety services since the implementation of the regional model

This performance audit follows up on some recommendations made in the 2019 audit that were intended to improve regional coordination. This follow-up audit examined what steps each ESD has taken to address safety gaps, including those identified in the first audit. We relied primarily on information reported by ESD officials and reviewing supporting documents. We did not evaluate the quality of services provided by ESDs, how many districts used or were satisfied with them, or how these services are currently funded.

The audit answered the following question:

- What actions have Educational Service Districts taken since our 2019 report to address safety gaps in their regions?

### Next steps

Our performance audits of state programs and services are reviewed by the Joint Legislative Audit and Review Committee (JLARC) and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the Office of the State Auditor will review this audit with JLARC's Initiative 900 Subcommittee in Olympia. The public will have the opportunity to comment at this hearing. Please check the JLARC website for the exact date, time, and location ([www.leg.wa.gov/JLARC](http://www.leg.wa.gov/JLARC)). The Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion. See **Appendix A**, which addresses the I-900 areas covered in the audit. **Appendix B** contains information about our methodology.

# Audit Results

## What actions have Educational Service Districts taken since our 2019 report to address safety gaps in their regions?

### Answer in brief

Each of the nine ESDs has established a regional school safety center. We assessed all nine ESDs to see whether they met legal requirements and selected recommended practices for their safety centers. All ESDs met requirements around threat assessments by providing training, resources and consultation. ESDs also met emergency operations planning requirements by offering trainings and following other recommended practices.

All ESDs met most required behavioral health services for their school districts, with some taking additional steps. However, state law also requires all ESDs to provide training and other activities to help school districts learn how to bill Medicaid for eligible behavioral health services, but only two ESDs do so on a regular basis. ESDs can help ensure school districts have Medicaid billing resources needed to help reduce district and state costs.

## Each of the nine ESDs has established a regional school safety center

All nine ESDs now have a regional school safety center, following the legislative requirement in 2019. The regional school safety centers provide support to school districts and their students for three safety-related topics.

- 1. Threat assessments.** School districts are required to use threat assessments to identify and support students who present a significant concern or threat to themselves and others. Statewide training and coordination on how to develop and use threat assessments helps ensure school districts have consistent information and technical guidance available to them, including assessment leading practices. Beginning in the 2020-21 school year, each ESD was required to have a threat assessment team, overseen by a coordinator. State law requires ESDs to train districts on the threat assessment model that has been adopted statewide. They must also build community partnerships with behavioral health providers, law enforcement agencies and others as part of their threat assessment programs.

2. **Emergency operations planning.** Each ESD has a school safety coordinator who coordinates with regional partners and helps districts develop safety plans and train staff. To ensure an effective response in the event of an emergency, all school districts were required to have comprehensive school safety plans, but before regional school safety centers were established, the state lacked oversight (aside from school district leadership) to ensure plans were complete. ESDs can help school districts ensure their plans are consistent with best practices and other districts in their ESDs, while also developing plans that are responsive to safety risks specific to their regions.
3. **Behavioral health.** ESDs are also now required to provide training that helps districts develop plans for addressing students' behavioral health needs. They must also offer direct help as the school districts work on those plans. State law directs ESDs to partner with community-based organizations that provide behavioral health services in order to help schools and districts connect students to needed services that are not available in school. The behavioral health services that are available to students depend on what schools are able to provide at the local level, so these connections between ESDs and behavioral health services providers offer an additional means of supporting students' needs. ESDs are also required to teach school districts in their region how to bill Medicaid for eligible behavioral health services, and offer help doing so if they need it. The Legislature provides funding for each ESD to have a behavioral health navigator to manage these responsibilities.

We assessed all nine ESDs to see whether they met legal requirements, but also whether they followed selected recommended practices.

### **All ESDs met requirements around threat assessments by providing training, resources and consultation**

All ESDs provide training and templates to school districts and schools on how to conduct initial screenings for threat assessments using the statewide model. An initial screening involves a school-based team – usually including a school administrator, a counselor and a School Resource Officer – who meet to discuss and document the student's behaviors that prompted the assessment. The team then develops a response plan or refers the situation to a community-based team. All ESDs also maintain their own threat assessment teams made up of community partners, including law enforcement and behavioral health providers, who can also help school districts develop their response plans. In all cases, the goal is to increase safety for the student, school and community.



ESD safety coordinators said they have taken some additional steps to ensure their efforts are successful. For example, threat assessment coordinators from all ESDs meet monthly to review and update guidance to ensure consistency across the state. Coordinators also stay up to date on best practices through the Association of Threat Assessment Professionals. **Exhibit 2** lists four required or recommended practices in the area of threat assessments.

**Exhibit 2 – Threat assessment required and recommended practices**

*Required practices set out in RCW 28A.310.510*

Required (or recommended) practice	Educational Service District number									Tally
	101	105	112	113	114	121	123	171	189	
Provide training and help using the model policy and procedure	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9
Help districts identify and use best practices	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9
Build community partnerships	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9
Provide threat assessment templates (recommended)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9

Source: Auditor prepared analyzing ESD responses and supporting documents.

**ESDs met emergency operations planning requirements by offering trainings and following other recommended practices**

All ESDs said they meet with regional partners in emergency management, including law enforcement, fire departments and county emergency managers, to coordinate safety plans for their school districts. These regional partnerships help establish roles and responsibilities, and ensure continuity when there is staff turnover at the school district level. For example, ESD 112 is a member of the Clark County Safe Schools Task Force, which brings together schools, emergency responders and other local agencies to address crisis prevention, response and recovery.

ESDs also help school districts develop their emergency operations plans. All ESDs provide emergency planning training directly or make sure their districts know about available trainings offered by other organizations. Eight of the nine ESDs also provide templates for emergency operations plans and review those plans with their school districts as requested. These templates and reviews can help ESDs establish consistency and accountability with their school districts. ESDs have either developed the templates themselves or use versions offered by the U.S. Department of Education.

- ESD 105 has taken its approach a step further, developing a systematic method for reviewing safety plans: staff meet monthly with schools to develop, implement and improve their safety plans.

Exhibit 3 lists four required or recommended practices in the area of emergency operations planning.

**Exhibit 3 – Emergency operations planning required and recommended practices**

*Required practices set out in RCW 28A.310.510*

Required (or recommended) practice	Educational Service District number									Tally
	101	105	112	113	114	121	123	171	189	
Coordinate with regional partners (such as first responders, emergency managers)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9
Coordinate and deliver trainings	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9
Provide templates for emergency plans (recommended)	Yes	Yes*	Yes	Yes	Yes	Yes	Yes	Yes	No	8 of 9
Review school districts’ safety plans (recommended)	Yes	Yes*	Yes	Yes	Yes	Yes	Yes	Yes	No	8 of 9

\* These ESDs provided additional service beyond legal requirements or recommended practices.

Source: Auditor prepared analyzing ESD responses and supporting documents.

**All ESDs met most required behavioral health services for their school districts, with some taking additional steps**

With one significant exception, all ESDs fulfilled all legislative requirements around supporting behavioral health needs in their school districts. And in several areas, they surpassed required activities to provide additional guidance or supports.

All ESDs said they participate in regional partnerships with community-based organizations in order to understand what services are available in their region and share this information with their school districts. These regional partnerships typically involve regular meetings between the ESD’s behavioral health navigator and local behavioral health providers to discuss available services and challenges in connecting students to care. The navigators then share this information with their school districts. For example, ESD 114 meets with local organizations in Kitsap, Jefferson and Clallam counties to learn about their services and then relays the information to school districts as needed.

- Two ESDs have taken additional steps to facilitate connections between providers and school districts, such as sharing a comprehensive resource directory. For example, ESD 123 maintains a resource directory that includes current wait times for services which staff update quarterly.

ESDs offer school districts guidance and training around behavioral health screenings and suicide prevention. All ESDs use guidance on behavioral health screening and response developed by the Office of Superintendent of Public Instruction. This guidance includes requirements for assigning district employees’ roles and responsibilities, identifying and partnering with service providers, and

communicating with parents and guardians. ESDs also provide required suicide prevention trainings as well as guidance on how to respond to the suicide or attempted suicide of a student.

- Three ESDs offer additional support to their districts by deploying crisis counseling response teams to help schools when they experience traumatic events. Crisis counseling response teams work with students, staff and parents to offer support after a traumatic event, including the suicide of a student.

However, state law also requires all ESDs to provide training and other activities to help school districts learn how to bill Medicaid for eligible behavioral health services. At present, only two ESDs do so on a regular basis.

Exhibit 4 lists seven required practices in the area of behavioral health supports.

### Exhibit 4 – Required practices in behavioral health supports

Required practices set out in RCW 28A.310.510

Required practice	Educational Service District number									Tally
	101	105	112	113	114	121	123	171	189	
Support development and implementation of plans for screening and response to emotional or behavioral distress	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9
Suicide prevention training	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9
Facilitate partnerships and coordination between school districts and regional behavioral health services	Yes	Yes*	Yes	Yes	Yes	Yes	Yes*	Yes	Yes	9 of 9
Help school districts build capacity to identify and support students	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9 of 9
Identify and integrate, to the extent practicable, health care service delivery models	Yes*	Yes	Yes	Yes	Yes	Yes	Yes*	Yes	Yes	9 of 9
Provide training, assistance and coordination related to Medicaid billing	Yes	Yes	No	No	No	No	No	No	No	2 of 9
Provide guidance in response to the suicide or attempted suicide of a student	Yes	Yes*	Yes*	Yes	Yes*	Yes	Yes	Yes	Yes	9 of 9

\* These ESDs provided additional service beyond legal requirements.

Source: Auditor prepared analyzing ESD responses and supporting documents.

## ESDs can help ensure school districts have Medicaid billing resources needed to help reduce district and state costs

ESDs and school districts can contract with managed care organizations to provide eligible students with behavioral health services that can be billed to Medicaid for reimbursement. Our previous audit of K-12 student behavioral health published in 2021 (see sidebar) found that both ESDs and school districts said it was difficult to become eligible to provide services that could be billed to Medicaid. The Health Care Authority, the state's Medicaid agency, gave educational agencies updated guidance on reimbursable services and how to contract with and bill managed care organizations.

As of October 2021, five ESDs and about 180 school districts have contracts with managed care organizations to deliver school-based health care services.

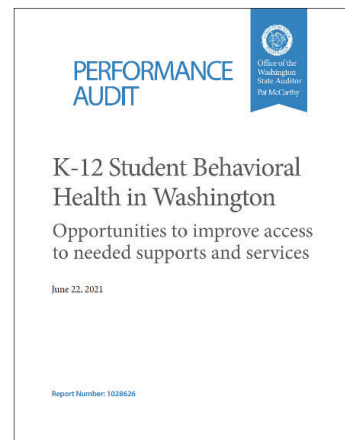
### Only two ESDs provide Medicaid billing help, despite legal requirements for all ESDs to provide training

State law related to the regional school safety centers requires that ESDs help districts learn how to bill Medicaid for eligible behavioral health services delivered at school. Billing eligible behavioral health services to Medicaid can help defray costs and save districts money because the federal government will reimburse schools and districts for some portion of the expenditure. The billing process is usually unfamiliar to school and district staff and can be complex, so having some training can help them leverage Medicaid funds efficiently. When no training is available, districts may simply decide to skip offering school-based health services.

Two of the nine ESDs said that they currently provide Medicaid billing training to their school districts. They developed their own training materials, so this resource could be made available for other ESDs to use. One ESD does not provide training, but it refers its school districts to existing training resources provided by the Health Care Authority.

However, most ESDs said they do not offer Medicaid billing training because their school districts have not asked for help in this area. When we asked ESDs why districts have not asked for training, most said they do not because school districts say the reimbursement rate from Medicaid is too low to make it worth the administrative effort and costs involved in the Medicaid billing process.

Nonetheless, because they are required to help with Medicaid billing, ESDs should ensure they are available and ready to provide school districts with the training and resources needed to bill Medicaid.



Read this report on our website at: <https://portal.sao.wa.gov/ReportSearch/Home/ViewReportFile?arn=1028626&isFinding=false&sp=false>

# Recommendations

## For Educational Service Districts

To address the lack of Medicaid billing training, as described on page 12, we recommend Educational Service Districts (ESDs):

1. Share with their school districts the guidance developed by the Health Care Authority or other ESDs, if they are unable to develop their own training materials

As an alternative to providing Medicaid billing training, we recommend:

2. ESDs determine the relative benefits compared to costs for school districts to bill Medicaid for services provided.
  - If there is little or no benefit to districts, ESDs should introduce legislation to remove the requirement to provide training to districts.

# Agency Response



February 14, 2023

The Honorable Pat McCarthy  
 Washington State Auditor  
 Insurance Building, Capital Campus  
 302 Sid Snyder Ave. SW  
 Olympia, WA 98504-0021

Dear Auditor McCarthy:

Thank you for the opportunity to review and respond to the School Safety Planning performance audit that follows up on selected issues from the 2019 report. I am responding on behalf of the nine Educational Service Districts (ESDs) as they are unified as the Association of ESDs (AESD) Network. Our ESDs have appreciated the open communication, collaboration, and opportunities to provide feedback to the audit team as they sought to understand and gather information about the Regional School Safety Centers (RSSCs) that were created in 2019 as a result of Second Substitute House Bill 1216.

The report provides a thorough and accurate overview of the work of our RSSCs in the areas of threat assessment, behavioral health navigation, and comprehensive safety/emergency operations supports. One nuance we would like to highlight is the phased-in approach the Legislature took to funding the RSSCs starting with threat assessment supports in 2019, behavioral health in 2020, and finally comprehensive safety/emergency operations support in 2021. Because of the late addition of the comprehensive safety/emergency operations positions in the midst of the pandemic, a few of our ESDs had workforce challenges with recruiting and retaining staff. This resulted in a later start with deploying resources and supporting districts with review of their safety plans (per p. 10). Today, all of our ESDs have are actively supporting districts with their safety and emergency operations plans.

The recommendations ask ESDs to address the lack of Medicaid billing training by either:

1. Sharing with their school districts the guidance developed by the Health Care Authority or other ESDs, if they are unable to develop their own training materials; or
2. Determining the relative benefits compared to costs for school districts to bill Medicaid for services provided, and, if there is little or no benefit to districts, introducing legislation to remove the requirement to provide training to districts.

ESDs provide training as requested by school districts within their regions. The ESD Behavioral Health Navigators in each region have worked to learn and understand the components to assist school districts across the state navigate the extremely complex Medicaid system. To assist the ESDs with this, the Washington Health Care Authority created a Medicaid School Based Behavioral Health Billing Toolkit that was finalized in 2022. This Toolkit is now available to for our Navigators and school districts to use as they explore the best Medicaid options based on their local contexts. The ESDs are committed to more proactively sharing the Toolkit with districts and support those who are interested, expand their capacity to bill Medicaid for services.

School safety and student well-being supports provided through the RSSCs is foundational to academic success. We appreciate the State Auditor's review of ESDs' regional school safety efforts and look forward to continuing our work across the state to support our school districts and their students.

Sincerely,

Jessica Vavrus, Executive Director  
 Association of Educational Service Districts (AESD) Network

NEW ESD 101 (Northeast WA) | ESD 105 (Yakima Valley) | ESD 112 (Southwest WA) | CRESD 113 (South Puget Sound) | OESD 114 (Olympic Peninsula) | PSESD 121 (Puget Sound) | ESD 123 (Southeast WA) | NCESD 171 (North Central WA) | NWECD 189 (Northwest WA)

# Appendix A: Initiative 900 and Auditing Standards

## Initiative 900 requirements

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor’s Office to conduct independent, comprehensive performance audits of state and local governments.

Specifically, the law directs the Auditor’s Office to “review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts.” Performance audits are to be conducted according to U.S. Government Accountability Office government auditing standards.

In addition, the law identifies nine elements that are to be considered within the scope of each performance audit. The State Auditor’s Office evaluates the relevance of all nine elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Results and Recommendations sections of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	<b>No.</b>
2. Identify services that can be reduced or eliminated	<b>No.</b>
3. Identify programs or services that can be transferred to the private sector	<b>No.</b>
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	<b>Yes.</b> This audit follows up on the 2019 Opportunities to Improve School Safety Planning audit’s recommendations to address school safety gaps through district practices related to plan development, coordination, training and oversight.
5. Assess feasibility of pooling information technology systems within the department	<b>No.</b>
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	<b>No.</b>

## I-900 element

## Addressed in the audit

7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions

**No.**

8. Analyze departmental performance data, performance measures and self-assessment systems

**Yes.** This audit follows up on the 2019 audit's recommendations to help districts address gaps in statewide school safety planning.

9. Identify relevant best practices

**No.**

## Compliance with generally accepted government auditing standards

We conducted this performance audit under the authority of state law (RCW 43.09.470), approved as Initiative 900 by Washington voters in 2005, and in accordance with generally accepted government auditing standards as published in *Government Auditing Standards* (July 2018 revision) issued by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## The mission of the Office of the Washington State Auditor

To provide citizens with independent and transparent examinations of how state and local governments use public funds, and develop strategies that make government more efficient and effective. The results of our work are widely distributed through a variety of reports, which are available on our website and through our free, electronic subscription service. We take our role as partners in accountability seriously. We provide training and technical assistance to governments and have an extensive quality assurance program. For more information about the State Auditor's Office, visit [www.sao.wa.gov](http://www.sao.wa.gov).



# Appendix B: Objectives, Scope and Methodology

## Objectives

The purpose of this performance audit was to answer the following question:

- What actions have Educational Service Districts taken since our 2019 report to address safety gaps in their regions?

## Scope

This performance audit examined what school safety services the state's nine ESDs provide to their school districts as of October 2022. The audit focused on a subset of requirements of RCW 28A.310.510, which outlines responsibilities of ESDs in the topics of behavioral health, threat assessments and emergency operations planning. These requirements included:

### Behavioral health

- Providing support for school district development and implementation of plans for recognition, initial screening and response to emotional or behavioral distress in students (RCW 28A.310.510(3)(a)(i))
- Suicide prevention training for school counselors, school psychologists and school social workers (RCW 28A.310.510(3)(a)(ii))
- Facilitating partnerships and coordination between school districts, public schools and existing regional and local systems of behavioral health care services (RCW 28A.310.510(3)(a)(iii))
- Assisting school districts and public schools in building capacity to identify and support students in need of behavioral health care services (RCW 28A.310.510(3)(a)(iv))
- Identifying, sharing, and integrating, to the extent practicable, behavioral and physical health care service delivery models (RCW 28A.310.510(3)(a)(v))
- Providing Medicaid billing related training, technical assistance and coordination between school districts (RCW 28A.310.510(3)(a)(vi))
- Guidance in implementing best practices in response to, and to recover from, the suicide or attempted suicide of a student (RCW 28A.310.510(3)(a)(vii))

## Threat assessments

- Providing training and technical assistance regarding the use of the model policy and procedure to establish a school-based threat assessment program (RCW 28A.310.510(3)(b)(i))
- Assisting with ongoing identification and implementation of best practices for school-based threat assessment programs (RCW 28A.310.510(3)(b)(ii))
- Building partnerships with community partners, such as behavioral health providers, law enforcement agencies, emergency responders, juvenile justice organizations and child welfare agencies (RCW 28A.310.510(3)(b)(iii))

## Emergency operations planning

- Assistance with coordinating other entities in the region to provide support to school districts before emergencies occur (RCW 28A.310.510(3)(c))
- Plan, coordinate, and deliver the trainings required by this subsection, and other school district staff trainings related to school safety (RCW 28A.310.510(3)(d))

These areas were outside the scope of this audit:

- The quality or effectiveness of school safety services provided by ESDs
- How many districts use the services provided by ESDs or their satisfaction with the services
- Funding sources for the regional school safety centers or whether this funding is sufficient

## Methodology

We obtained the evidence used to support the findings, conclusions and recommendations in this audit report during our fieldwork period (September 2022 to October 2022). To address this audit's objective, we used the following audit methodologies:

- Reviewed legal requirements concerning the safety-related services ESDs must provide under RCW 28A.310.510
- Reviewed each ESD's website to gain a high-level understanding of safety services provided
- Requested written responses and supporting documents from ESDs to gain additional understanding of services provided, and conducted interviews with ESD employees to clarify information as needed
- Compared responses from ESDs to legal requirements and identified gaps in services.

**Work on internal controls**

The audit reviewed whether ESDs had internal controls in place to help them comply with the legal requirements evaluated. These controls included policies on screening and response to behavioral distress, suicide prevention and threat assessments, including policies disseminated by the Office of Superintendent of Public Instruction to ESDs. We evaluated whether or not internal controls existed. We did not assess the design, implementation or effectiveness of these internal controls.



“Our vision is to increase **trust** in government. We are the public’s window into how tax money is spent.”

– Pat McCarthy, State Auditor

Washington State Auditor’s Office  
P.O. Box 40031 Olympia WA 98504

[www.sao.wa.gov](http://www.sao.wa.gov)

**1-564-999-0950**



Office of the Washington State Auditor  
Pat McCarthy