



**Mohammed Choudhury**  
State Superintendent of Schools

**BILL:** House Bill 515 – Active Shooter Safety Drills – Requirements      **DATE:** February 15, 2023

**SUBJECT:** Letter of Support with Amendments      **COMMITTEE:** Ways and Means

**POSITION:** Support with Amendments

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**EXPLANATION:**

The Maryland State Department of Education (MSDE) offers this letter of support with amendments for House Bill (HB) 515 – Public Schools – Active Shooter Safety Drills – Requirements. HB 515 expands the existing functions and duties of the Maryland Center for School Safety (MCSS) and requires MCSS to collaborate with an institution of higher education to study the effectiveness of active shooter safety drills by researching and analyzing the data collected from local education agencies (LEA). The bill also requires the MCSS to annually evaluate and update Maryland’s Model Policy for Behavior Threat Assessment, which was developed by the MCSS and published in September 2018 in accordance with the Maryland Safe to Learn Act. Under HB 515, the Model Policy must be updated to include best practices for promoting communication and appropriate responses within a school community, including measures for increasing mental health services for student and school personnel who need additional support before, during, and after active shooter safety drills.

Furthermore, HB 515 requires that MSDE, in consultation with the MCSS Subcabinet, adopt regulations to incorporate in the annual schedule of drills for each LEA developmentally and age appropriate components of the Active Shooter Preparedness Program developed by the Department of Homeland Security or the active shooter guidelines adopted by the Maryland Active Assailant Work Group. Drills incorporated under this bill must be developmentally and age appropriate and have restrictions (e.g., limitations on loud sounds simulating gunfire or explosions, and role-playing as an active shooter or victim).

HB 515 would require that LEAs identify students or school personnel who may require additional support before, during, and after a drill, including individuals with disabilities or those who have experienced trauma. LEAs must provide additional resources and coping strategies for individuals that require additional support. Based on MSDE’s ongoing engagement with student services personnel, including

mental and behavioral health staff, the agency has learned that LEAs are facing significant challenges in providing needed services to students and families under the current circumstances. MSDE estimates that the requirements of HB 515 would increase demand for mental and behavioral health resources that are already scarce.

Additionally, HB 515 requires MSDE to consult with MCSS, State Police, LEAs, and civil rights groups to develop model content that informs parents of the State's firearm storage laws and best practices for firearm storage. MSDE would be required to evaluate and update the model content as needed. To implement this provision in the bill effectively, MSDE would need to rely heavily on the input from stakeholders as the agency does not have experience or expertise on firearms storage laws and best practices for safe firearm storage. Other agencies listed in the bill would need to contribute to efforts in these areas.

**MSDE supports HB 515 and recommends the following amendments:**

1) Modify language in the bill to shift away from specific "active shooter" safety drills to a broader approach that encompasses a wider variety of drills that can accomplish the same objectives. The Emergency Planning Guidelines for Local School Systems and Schools (2019) recommends an "all hazards" approach to emergency planning, which allows LEAs to respond to a range of emergencies varying in scale, duration, and cause. The Guidelines recommend (but are not limited to) drills including evacuation, reverse evacuation/lockout, severe weather, shelter-in-place, lockdown, and drop/cover/hold. LEAs should be acutely aware of the titles and language used in the drills to diminish possible anxiety on the part of students and staff, especially those with previous trauma. During active shooter situations, these drills (or a combination thereof), may be helpful in preparing students and school personnel without the additional trauma and mental distress that "active shooter" safety drills may cause. This approach will likely lead to a more effective use of mental and behavioral health resources to address the ongoing needs of students and staff.

2) Modify language to clarify the roles of MSDE, MCSS, State Police and other law enforcement agencies, LEAs, and civil rights groups regarding development of model content that informs parents/guardians of the State's firearm storage laws and best practices for firearm storage. MSDE does not have expertise in this area and should not be the lead agency responsible for the development of the model content. MSDE strongly recommends instead partners in the law enforcement and civil rights communities in close coordination with MCSS lead the development of model content that informs parents/guardians of the State's firearm storage laws and best practices for firearm storage given that they have substantial content knowledge in this area and therefore are better equipped to carry out this provision in the bill.

MSDE respectfully requests that you consider this letter of support with amendments as you deliberate HB 515 – Public Schools – Active Shooter Safety Drills – Requirements. Please contact Mary Gable, Assistant State Superintendent, Division of Student Support, Academic Enrichment, and Educational Policy by phone at 410-767-0472, or by email at [mary.gable@maryland.gov](mailto:mary.gable@maryland.gov) for additional information.