



SB 848 Implementation Guide

District Action Steps, CSSP Inserts, and Operational Tools

Purpose. This guide organizes district implementation actions related to SB 848 into board policy, administrative regulation, CSSP, training, supervision, notification, and annual review workstreams. It is written as a practical district-facing tool that can be adapted into board packets, compliance memoranda, and site-level implementation plans.

Prepared For: District planning and school safety implementation

Use Cases: Board policy updates, CSSP annual review, staff and volunteer training, audit preparation

Core Topics: Professional boundaries, mandated reporter expansion, supervision, crime assessment, incident notification

Executive Summary

- SB 848 requires districts to move beyond a narrow reporting lens and strengthen prevention, supervision, professional boundaries, and annual safety planning.
- Districts should align child abuse reporting references to the broader term child abuse or neglect reporting so plans and policies match CANRA terminology.
- District procedures should expressly address employees, eligible adult volunteers, governing board members, and covered contractors whose roles trigger mandated reporter obligations.
- Non-classroom supervision should be addressed across Board Policy, Administrative Regulation, and each site Comprehensive School Safety Plan.
- School Safety Committees should review non-school-specific criminal activity in the surrounding community during the annual CSSP update and incorporate appropriate mitigation measures.
- Districts should establish a structured decision framework for discretionary notification of violent crime or sex offenses to parents/guardians and staff.
- Priority District Actions

Priority District Actions

WORKSTREAM	IMMEDIATE ACTION	EVIDENCE OF COMPLETION
Policy / AR	Update BP/AR language and approval path	Board item, revised BP/AR, legal references
Training	Launch mandated reporter and boundary training	Training roster, certificates, reminders
Supervision	Complete site supervision audits and maps	Duty plans, maps, corrective actions
CSSP	Insert required language and annual review tools	Updated CSSP sections and committee minutes
Notification	Adopt decision criteria and templates	Template set and administrator guidance
Audit	Schedule annual review and compliance check	Annual report and corrective action log

1. Professional Boundaries Policy

Districts should adopt a written professional boundaries framework that clearly defines acceptable and prohibited interactions among staff, students, volunteers, contractors, and other adults working in school settings.

Core policy elements

- Acceptable and prohibited staff-student interactions
- Digital communication rules, including personal devices, social media, and messaging applications
- One-on-one contact rules, including visibility, supervision, and approved exceptions
- Transportation boundaries and restrictions on transporting students in non-approved situations
- Supervision expectations during class, non-classroom, extracurricular, and after-hours activities

Implementation actions

- Present the updated policy for Board approval.
- Embed the policy into the CSSP, HR handbooks, campus security manuals, and onboarding materials.
- Require acknowledgment during onboarding for employees, volunteers, and contractors.
- Use the policy as the basis for training, investigations, and corrective action.

2. Child Abuse or Neglect Reporting Updates

Districts should update policy, regulation, and CSSP language so reporting terminology and mandated reporter coverage are aligned with the Child Abuse and Neglect Reporting Act (CANRA) and SB 848 implementation requirements.

Recommended terminology direction

- Update references from “child abuse reporting” to “child abuse or neglect reporting” where district documents are describing reporting procedures.
- Retain official statutory titles, including Child Abuse and Neglect Reporting Act (CANRA), in legal references and explanatory text.
- Treat this change as terminology alignment, not as a new legal category of misconduct.
- Mandated reporter coverage to reflect in policy and training
- District employees
- Eligible adult volunteers
- Governing board members
- Covered contractors whose duties require contact with or supervision of pupils

Suggested policy concepts

All known or reasonably suspected incidents of child abuse or neglect shall be reported as required by law.

An eligible volunteer is an individual 18 years of age or older who interacts with pupils outside the immediate supervision and control of the pupil’s parent/guardian or a school employee, as defined by law.

The Superintendent or designee shall provide training regarding the duties of mandated reporters and maintain procedures to document completion and acknowledgments.

Operational actions

- Provide training to all covered groups.
- Track completion electronically and send reminders to non-compliant personnel.
- File certificates and acknowledgments in personnel, volunteer, or digital HR records.

3. Supervision of Non-Classroom Spaces

The district should ensure that supervision expectations for non-classroom areas are addressed at the Board Policy level, operationalized through Administrative Regulation, and implemented site-specifically within each Comprehensive School Safety Plan.

Governance crosswalk

LAYER	WHAT TO INCLUDE	Examples
BP	District-level expectation for adequate supervision wherever students are present	Non-classroom spaces; before/after school; transitional times; recognition that volunteers may be mandated reporters; direction to develop procedures
AR	Operational rules and implementation procedures	Duty schedules; no one-on-one in isolated areas; line-of-sight expectations; training requirements; sign-in and documentation rules
CSSP	Site-specific application and monitoring	Supervision maps; duty assignments; bell schedule coverage; high-risk areas; restroom and dismissal procedures; audit tools

Site implementation steps

- Complete a full supervision audit of all sites.
- Map all non-classroom areas and identify blind spots and high-risk zones.
- Develop a written supervision plan for each campus.
- Assign staff and security duties for hallways, locker rooms, quads, restrooms, and other non-classroom spaces.
- Implement environmental improvements such as lighting, cameras, landscaping modifications, and door-window visibility enhancements.
- Train all staff on supervision expectations and role accountability.

4. Expanded Crime Assessment for the Annual CSSP Review

The School Site Council or School Safety Committee should evaluate non-school-specific criminal activity in the surrounding community during the annual CSSP update process and use that information to inform prevention, supervision, and response planning.

CSSP directive language

The School Site Council or School Safety Committee shall, during the annual review and update of the Comprehensive School Safety Plan, include an evaluation of non-school-specific criminal activity occurring in the surrounding community. This evaluation shall be conducted in coordination with local law enforcement and, when appropriate, other community partners. The Committee shall use this information to assess potential impacts to student and staff safety, identify emerging risks, and incorporate appropriate prevention, supervision, and response measures into the plan.

Committee review checklist

REVIEW AREA	WHAT THE COMMITTEE SHOULD DO
Law enforcement coordination	Invite local law enforcement participation, review crime data or trends, and establish an ongoing communication process such as quarterly updates.
Community crime assessment	Review violent crime, sex offenses, gang activity, drug activity, and other relevant community safety concerns.
Proximity and impact analysis	Consider incidents near the school, during arrival or dismissal, along travel routes, and any likely spillover onto campus.
Risk determination	Document identified risks, high-risk times and locations, and whether crime trends are increasing, decreasing, or stable.
Mitigation and prevention	Consider increased supervision, arrival/dismissal adjustments, law enforcement presence, parent communication, and student education.
CSSP integration	Incorporate findings into the CSSP and retain documentation of revisions, committee minutes, and recommendations.

5. Notification of Violent Crime or Sex Offense

The decision to notify parents/guardians and staff should be structured, documented, and coordinated with law enforcement when appropriate. CSSP language should reflect that notification is discretionary and based on defined decision criteria.

CSSP language

The principal or designee may notify parents/guardians and staff when a violent crime or sex offense occurs on campus. Notification decisions shall be made in coordination with law enforcement, when appropriate, and shall consider the impact on student and staff safety, the need for timely awareness, and legal or investigative constraints. The district shall utilize pre-established communication protocols and templates to ensure timely, accurate, and appropriate notification.

Decision criteria to include in the CSSP

DECISION FACTOR	GUIDANCE
Nature and severity of the incident	Whether the incident meets the definition of a violent crime or sex offense and the level of seriousness, including weapon involvement, injury, coercion, or threat.
Ongoing threat to safety	Whether there is a continuing or unresolved risk to students or staff and whether involved persons are in custody, identified but not apprehended, or unknown.
Location and impact	Whether the incident occurred on campus or during a school-sponsored activity, its proximity to students and staff, and whether the impact is isolated or broader.
Need for awareness	Whether notification would promote safety awareness, reduce misinformation, or address likely concern within the school community.
Law enforcement coordination	Timing of notification, information that may be released, and the need to avoid interference with an active investigation.
Student privacy and legal considerations	Compliance with FERPA and confidentiality requirements and avoidance of personally identifiable information.
Age and developmental considerations	Whether and how the communication should be adjusted based on grade level and the sensitivity of the incident.

DECISION FACTOR**GUIDANCE**

Credibility of information	Whether the report is verified or under investigation and whether the district should avoid notification based on speculation.
Availability of support services	Whether counseling or other support resources can be made available at the time of notification.
Consistency with district protocols	Alignment with district crisis communication procedures and use of pre-approved templates.

6. Integration Into District Plans, Manuals, and Handbooks

Implementation should not live in the CSSP alone. Districts should align emergency planning, campus security guidance, handbooks, and acknowledgment systems so expectations are consistent across programs and personnel categories.

- Update the CSSP to reflect SB 848-related requirements and site procedures.
- Insert new boundary, training, supervision, and reporting rules into the district EOP or companion emergency planning materials.
- Revise the campus security manual with updated patrol, observation, supervision, and reporting duties.
- Ensure student, parent, volunteer, and HR handbooks include the applicable sections or references.
- Provide each school site with updated documentation and require administrator sign-off confirming receipt and implementation.

Appendix A. Suggested District Work Product Checklist

- Professional boundaries policy and board action item
- Updated BP/AR 5141.4 language or equivalent child abuse or neglect reporting revisions
- Volunteer, contractor, board member, and employee training plan
- District training tracker and certificate retention process
- Site supervision audit tool and completed campus maps
- CSSP inserts for crime assessment and notification criteria
- Law enforcement coordination process and data-sharing template
- Annual compliance audit calendar and reporting format

Appendix B. Findings Summary / Corrective Action Log

SITE/AREA	FINDING OR DEFICIENCY	OWNER	CORRECTIVE ACTION / DUE DATE

Appendix C. CSSP Insert Language Library

1. Child abuse or neglect reporting terminology

Districts should review and update safety plans, policies, and training materials to ensure consistent use of the term “child abuse or neglect reporting,” aligning with the Child Abuse and Neglect Reporting Act (CANRA). This ensures that both abuse and neglect are clearly addressed in reporting procedures and staff or volunteer training.

2. Annual review of non-school-specific criminal activity

The School Safety Committee shall, as part of the annual review and update of the Comprehensive School Safety Plan, consider non-school-specific criminal activity in the surrounding community, in consultation with local law enforcement and other relevant agencies. This review shall inform the assessment of potential risks to the school and the development of appropriate prevention, supervision, and response strategies.

3. Notification of violent crime or sex offense

The principal or designee may notify parents/guardians and staff when a violent crime or sex offense occurs on campus. Notification decisions shall be made on a case-by-case basis and shall balance transparency, student and staff safety, privacy, law enforcement considerations, and investigative constraints.

4. Non-classroom supervision statement

The district shall maintain adequate supervision in non-classroom areas, including before school, after school, and during transitional periods. Site administrators shall assign responsible adults, maintain line-of-sight coverage when feasible, and document supervision plans in the site Comprehensive School Safety Plan.

Appendix D. Notification Template

Parent / guardian and staff notification template

Subject: Important Safety Notification

Dear Parents/Guardians and Staff,

This message is to inform you that a [violent incident / reported sex offense] occurred on campus on [date] at approximately [time]. School staff responded immediately and took steps to support student and staff safety.

Law enforcement [has been notified / responded] and [is investigating / has completed its response]. At this time, [there is no ongoing threat to campus safety / additional safety measures have been implemented out of an abundance of caution].

Due to privacy laws and the need to protect the integrity of the process, the district cannot share identifying details. Support services are available for any student or staff member who may need assistance. Please contact [school office / administrator / counselor] at [contact information] with questions or concerns.

Sincerely,

[Principal Name]

[School Name]

Time-based patterns and areas of concern template

TEMPLATE ITEM	SPACE FOR COMPLETION
Time-based patterns	Before school / During school / After school / Evenings-weekends
Areas of concern	
Law enforcement recommendations	Increased patrols / Environmental changes / Supervision adjustments / Community outreach
Site response actions	
