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The Right to Bear Arms... and Lesson Plans

Ryan Saboff

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THE RIGHT TO BEAR ARMS . . . AND LESSON PLANS

Ryan Saboff

“A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.”¹

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INTRODUCTION

Our nation’s schools should be sanctuaries for both teaching and learning alike. Hearing the name of schools like Columbine, Sandy Hook, or Virginia Tech no longer conjures up thoughts of established academic institutions, but rather of former victims of targeted violence directed at America’s school system. Society has tried to rationalize why these acts of violence occur and have reasoned that it must be due to things such as: increased bullying, dysfunctional family environments, unaddressed mental health issues, an easier access to weapons than in the past, gang involvement, violence on television, films, and videogames, or some combination thereof.²

1. U.S. CONST. amend. II.

2. *Causes of School Violence*, CONST. RTS. FOUND., <http://www.crf-usa.org/school-violence/causes-of-school-violence.html> (last visited June 10, 2019).

As a means to further our understanding of why attacks occur on American school campuses, the United States Secret Service³ (Secret Service) conducted a study of all school shootings prior to the Columbine attack in 1999.⁴ Analyzing the same information and techniques used to prevent assassinations on elected officials and heads of foreign states, the Secret Service developed a report, commonly referred to as the *Safe School Initiative*, which identified and studied thirty-seven incidents of targeted school violence prior to the Columbine massacre.⁵

Surprisingly, the Secret Service found that there was no single “accurate or useful profile of students” who conducted acts of violence on schools.⁶ While all of the attackers were boys, there was not a single set of character traits that could even be used to describe a simple majority of the attackers.⁷ Contrary to popular belief, what was conclusive in the report was that attacks on school campuses were rarely a spur of the moment or impulsive outbreaks by irrational, emotional teenagers.⁸ Rather, the attacks were thought out beforehand and at times included a “degree of advanced planning” on part of the assailant, sometimes involving preparation over a year in advance.⁹ In many cases, the attackers premeditated and planned everything from the time of day of the shooting, the type of weapons to use, type of clothes to wear, the most effective point of entry, and even distractions to buy additional time from local law enforcement.¹⁰ Further complicating the issue, most attackers never threatened their targets prior to executing their attack, providing little to no forewarning that an attack was imminent.¹¹

Most importantly, the *Safe School Initiative* found that most school-based attacks were not actually stopped by law enforcement, but rather by school administrators, educators, and students, or by the attacker stopping on his own either by quitting and dropping their

3. 18 U.S.C. § 3056 (2013).

4. William Van Ornum, *The Secret Service on Preventing School Violence*, NAT'L REV. (Dec. 17, 2012, 6:55 PM), <http://www.nationalreview.com/corner/335825>.

5. BRYAN VOSSEKUIL ET AL., U.S. SECRET SERV. & U.S. DEP'T OF EDUC., *THE FINAL REPORT AND FINDINGS OF THE SAFE SCHOOL INITIATIVE: IMPLICATIONS FOR THE PREVENTION OF SCHOOL ATTACKS IN THE UNITED STATES* 7 (2004), <https://www2.ed.gov/admins/lead/safety/preventingattacksreport.pdf>.

6. *Id.* at 19.

7. *Id.*

8. *Id.* at 23.

9. *Id.* at 23-24.

10. Frank J. Robertz, *Deadly Dreams*, SCI. AM. MIND, Aug.-Sept. 2007, at 52, 54.

11. VOSSEKUIL ET AL., *supra* note 5, at 25.

arms or in a few incidents, committing suicide.¹² The report found that the reason law enforcement was not able to reliably intervene during mass school shootings was due to the brevity of the attacks themselves.¹³ The Secret Service discovered that the majority of mass school shootings lasted less than fifteen minutes, with about twenty-seven percent of those instances lasting a total of less than five minutes from the time of their inception.¹⁴ The results of the *Safe School Initiative* exemplify just how unpredictable mass shootings on school campuses are and how they can generate numerous victims in a small amount of time.¹⁵ Further, this report emphasizes just how little we, as a society, know about the root causes of mass school shootings and our inability to effectively prevent them.

This Article will argue that due to the unique characteristics of mass school shootings, including their swiftness, unpredictability, and at times advanced planning and preparation, that American society can no longer simply rely on law enforcement to effectively stop or even prevent future acts of mass violence from occurring on our schools. Rather, legally licensed and armed teachers and school personnel are actually the most effective deterrent to mass school shootings. The primary focus of this Article will be schools kindergarten through twelfth grade (K-12), as they comprise of the majority of mass shootings¹⁶ in the United States and typically do not have their own school police department as most public and private postsecondary schools do.¹⁷

Part I of this Article will review how some noteworthy states are legislatively combating this problem by allowing school faculty to

12. *Id.* at 27-28.

13. *Id.* at 28.

14. *Id.*

15. See generally Joshua Gillin et al., *The facts on mass shootings in the United States*, POLITIFACT (Nov. 8, 2017 11:29 AM), <http://www.politifact.com/truth-o-meter/article/2017/nov/08/facts-mass-shootings-united-states/> (“After the 2012 Sandy Hook school shooting, Congress defined ‘mass killings’ as three or more homicides in a single incident.”).

16. PETE J. BLAIR & KATHERINE W. SCHEIT, TEX. ST. U. & U.S. DEP’T OF JUST.: FED. BUREAU OF INVESTIGATION, A STUDY OF ACTIVE SHOOTER INCIDENTS BETWEEN 2000 AND 2013, 15-16 (2014), <https://www.fbi.gov/file-repository/active-shooter-study-2000-2013-1.pdf/view>. Of the thirty-nine mass school shootings that occurred between 2000 and 2013, twenty-seven, or sixty-nine percent, occurred on schools K-12, with the remaining twelve incidents occurring on private and public colleges and universities. *Id.*

17. Melinda D. Anderson, *The Rise of Law Enforcement on College Campuses*, THE ATLANTIC (Sept. 28, 2015), <https://www.theatlantic.com/education/archive/2015/09/college-campus-policing/407659/> (noting that there are over 4,000 police departments that operate on public and private postsecondary schools who are primarily focused on student safety and they do not have the same public-reporting requirements of crime as municipal police officers in order to have an accurate analysis of incidents of gun violence on university campuses).

legally carry weapons, with proper training and licensing, on school campuses. Part II will discuss the strong opposition to allowing guns on school campuses and analysis of suggested alternative preventative measures. Part III of this Article will analyze how effective these legislative measures have been since their inception. Finally, Part IV will attempt to look to the future in order to predict the ongoing evolution of legally allowing guns on school campuses.

I. SELECT STATES THAT PRESENTLY ALLOW GUNS ON CAMPUS K-12

In his recent book, award-winning author Colin Woodard identified that the United States could be broken down into eleven separate nation-states, each with its own dominant cultures that could help explain everything from voting behaviors to opinions on social issues.¹⁸ Due to the societal differences of America's fifty states, this Section will explore some of the leading states that have legislatively allowed guns on campuses in different regions of the country, as well as some of the individual factors that have prompted these states to address the issue of violent attacks on school campuses by legally allowing guns in schools K-12.

A. Colorado

Colorado fell victim to one of the worst mass shootings in United States history as well as one of the deadliest acts of school violence when two teenage boys¹⁹ unleashed terror at Columbine High School (Columbine).²⁰ Yet, instead of passing legislation to further restricting guns on campus, Colorado has made a specific exception to qualifying individuals.²¹ To have a proper understanding of the apparent contradicting position passed by Colorado's legislature, there must be a clear understanding of what the state experienced that lethal day of the Columbine massacre.

18. See generally COLIN WOODARD, AMERICAN NATIONS: A HISTORY OF THE ELEVEN RIVAL REGIONAL CULTURES OF NORTH AMERICA (2012); see also Reid Wilson, *Which of the 11 American nations do you live in?*, WASH. POST (Nov. 8, 2013), https://www.washingtonpost.com/blogs/govbeat/wp/2013/11/08/which-of-the-11-american-nations-do-you-live-in/?utm_term=.af0ad7d15836.

19. Throughout this Article, the names of the perpetrators of these violent acts will be intentionally withheld out of respect for the victims and their families.

20. *Columbine High School Fast Facts*, CNN, <http://www.cnn.com/2013/09/18/us/columbine-high-school-shootings-fast-facts/index.html> (last updated Mar. 25, 2018, 6:50 PM).

21. COLO. REV. STAT. § 18-12-214 (2014). A concealed carry permit does not authorize the holder to carry onto public schools, except a permittee who is employed by a school district as a school security officer. *Id.*

The attack on Columbine officially started at 11:19 AM after the assailants detonated two pipe bombs several blocks away from the school.²² The bombs were used purely as a distraction for police whom they anticipated would otherwise be promptly responding to their assault.²³ Simultaneously with the sounds of the explosions, the assailants started to fire at students sitting outside the cafeteria.²⁴ By 11:23 AM, cafeteria employees were already on the phone with a 911 operator.²⁵ The sheriff's deputy, who was assigned to the school, was immediately in the West parking lot by 11:24 AM.²⁶ The deputy exchanged gunfire with one of the assailants before the assailant retreated back into the school.²⁷ Despite being joined by six other officers, the deputy was ordered not to enter into the school at that time.²⁸ After briefly exchanging gunfire with the police outside of the school, the assailants then rejoined one another and began shooting students in close range while continuously throwing small bombs.²⁹

Jefferson County Sheriff John Stone explained that bombs, booby traps, and a lack of information regarding the total number of shooters were the primary obstacles preventing law enforcement from entering the school while the shooters remained active.³⁰ The majority of lives were taken after the assailants had entered into the school library at 11:29 AM, though police were already on the scene.³¹ The two assailants were the only two people in the school who were armed and in less than eight minutes they had "killed 10 people and injured 12 others" who were hiding under desks and behind bookshelves in the school library.³²

Forty-seven minutes after the shootings began, the Jefferson County Special Weapons and Tactics team (SWAT) assembled and entered the building.³³ The team was initially only in the building for approximately two minutes and it would take them another three

22. Jennifer Rosenberg, *The Columbine Massacre*, THOUGHTCO., <https://www.thoughtco.com/columbine-massacre-1779624> (last updated Jan. 24, 2018).

23. *Id.*

24. *Id.*

25. David Kohn, *What Really Happened at Columbine? Did So Many Have to Die?*, CBS NEWS (Apr. 17, 2001), <https://www.cbsnews.com/news/what-really-happened-at-columbine/>.

26. *Id.*

27. *Id.*

28. *Id.*

29. Rosenberg, *supra* note 22.

30. Kohn, *supra* note 25.

31. Rosenberg, *supra* note 22.

32. *Id.*

33. Kohn, *supra* note 25.

hours before they could confirm that the gunmen had already committed suicide hours earlier at 12:08 PM.³⁴ During this time, students and teachers were left helpless as law enforcement remained outside as their peers lay bleeding inside of the school. Just before noon, student Mike Rotole put a handwritten sign on a window that read, “[o]ne bleeding to death” in a desperate cry for help.³⁵ By this time, there were approximately seventy-five police officers on the scene who were waiting for instructions from their commanders.³⁶

The purpose of this narrative was not to relive the gruesome experiences that the students and faculty experienced that day, but rather to have a proper understanding of Colorado’s response to this incident. Enacted in 2003, three years after the Columbine attack, Colorado’s “Concealed Carry Act” was passed with a provision that allows school employees, including teachers and faculty, to carry concealed weapons, if they are properly licensed and designated as a school security officer.³⁷ By allowing schools to designate which employees are school security officers, the Act keeps schools informed and in control of how many guns they allow onto their campuses. This also can be catered to each school’s individual needs. There are many large, rural school districts in Colorado that are thirty to forty-five minutes away from the nearest police department.³⁸

School staff members with concealed carry permits have already started to complete the three-day training program from the Faculty/Administrator Safety Training and Emergency Response group (FASTER).³⁹ The FASTER training not only teaches faculty and staff how to properly use firearms in the classroom, but also how to use trauma kits and tourniquets for those injured by knives or gunshots.⁴⁰ FASTER’s course goal is not to replace law enforcement or EMS, but to “allow teachers, administrators, and other personnel to stop school vio-

34. *Id.*

35. *Id.*

36. *Id.*

37. COLO. REV. STAT. § 18-12-214(3)(b) (2014).

38. Perry Chiaramonte, *Teachers Packing Heat: More Educators Taking Gun Training Classes*, FOX NEWS (June 28, 2017), <http://www.foxnews.com/us/2017/06/28/teachers-packing-heat-more-educators-taking-gun-training-classes.html>.

39. Noel Brennan, *Active shooter training in Colorado teaches school staff to shoot back*, 9NEWS (June 20, 2017, 9:36 PM), <http://www.9news.com/news/local/next/active-shooter-training-in-colorado-teaches-school-staff-to-shoot-back/450818166>.

40. Brandon Morse, *A Colorado county is training teachers to carry firearms on school grounds*, THEBLAZE (June 21, 2017, 12:16 PM), <http://www.theblaze.com/news/2017/06/21/a-colorado-county-is-training-teachers-to-carry-firearms-on-school-grounds/>.

lence rapidly . . . [and to] administer medical aid where necessary.”⁴¹ FASTER’s curriculum was developed by recognizing that school staff members are actually the “first responders” to school violence, and not law enforcement or emergency medical services (EMS) personnel.⁴²

FASTER was setup by parents, law enforcement officers, safety experts, and medical professionals who believe that schools are a target for violence.⁴³ By design, FASTER’s training program also conceals the identity of faculty members who have completed the course.⁴⁴ Their identities are concealed to prevent the participants of the program from becoming the primary targets of interest of assailants, as well as to instill the elements of surprise as gunmen will not know which staff members have the ability to effectively defend both themselves and their students.⁴⁵

FASTER’s training program, in collaboration with the concealed carry laws of Colorado, is an appropriate and necessary response to the issue of mass school violence. During the entire forty-seven-minute attack, the two teenage boys were the only people in the school who were armed, leaving faculty and staff helpless to be able defend their students or themselves. As depicted by the time it took law enforcement to enter the school, as well as the findings of the *Safe School Initiative*, FASTER will not only provide a means for trained faculty to be able to stop an active gunman, but also to save lives until emergency personnel are cleared to enter the scene.⁴⁶

Despite the cries for help from the students, EMS personnel were directly prevented from entering inside of the school, a policy that still affected the victims in the mass shooting at Pulse Nightclub in Orlando, Florida, seventeen years later.⁴⁷ Since, EMS are logically prevented from entering active shooter scenarios, by already having personnel trained in treating trauma wounds, it is unknown how many more lives could have been saved at Columbine with proper knowledge.

41. *US gun laws: Colorado to arm teachers in classrooms*, BBC NEWS (June 21, 2017), <http://www.bbc.com/news/world-us-canada-40353408>.

42. *Id.*

43. *Id.*

44. Brennan, *supra* note 39.

45. *Id.*

46. Kohn, *supra* note 25; VOSSEKUIL ET AL., *supra* note 5.

47. Molly Hennessy-Fiske, *Paramedics barred from saving orlando shooting victims because club was deemed too dangerous*, L.A. TIMES (June 22, 2016, 3:45 PM), <http://www.latimes.com/nation/la-na-orlando-paramedics-20160622-snap-story.html> (“Typically at active shootings, rescue workers are told to wait in safe, or ‘cold’ zones until law enforcement can clear ‘hot zones’ where gunmen are still active.”).

For example, Dave Sanders, who was a teacher at Columbine, was shot while heroically attempting to direct his students away from the active shooters.⁴⁸ While other teachers did what they could to assist him, it took EMS nearly four hours to get to him.⁴⁹ By the time they reached him at 3:24 PM, Dave Sanders had already passed away due to blood loss.⁵⁰ If completion of the FASTER training would give school staff members the opportunity to save just one life, such as that of Dave Sanders', why would all states not follow their lead to train their faculty members to be prepared to treat and handle a violent scenario?

B. Georgia

After the tragedy that occurred in Newtown, Connecticut at Sandy Hook Elementary School (Sandy Hook), nearly all fifty states passed some form of legislation in response to the mass shooting.⁵¹ Approximately two-thirds of the total states actually eased gun restrictions and expanded the rights of gun users after Sandy Hook.⁵² Surprisingly, a growing number of states have allowed guns on school campuses, not because of mass shootings that occurred within their own state boundaries, but rather in reaction to the tragedy that occurred at Sandy Hook.⁵³ However, no state expanded the rights of gun users more than Georgia when their legislative body passed the Safe Carry Protection Act.⁵⁴

Georgia's Safe Carry Protection Act, nicknamed the "Guns Everywhere Bill" by those who oppose the law, allows licensed concealed

48. Kohn, *supra* note 25.

49. *Id.*

50. *Id.*

51. *State Gun Laws Enacted in the Year After Newtown*, N.Y. TIMES (Dec. 10, 2013), <http://www.nytimes.com/interactive/2013/12/10/us/state-gun-laws-enacted-in-the-year-since-newtown.html>.

52. *Id.*

53. Lauren Russell, *In response to Newtown shootings, some states move to put guns in classrooms*, CNN (June 12, 2013, 11:50 AM), <http://schoolsofthought.blogs.cnn.com/2013/06/12/in-response-to-newtown-shootings-some-states-move-to-put-guns-in-classrooms/> ("In the six months since the mass shooting at Sandy Hook Elementary . . . laws [allowing teachers and other school staff to carry firearms] have been enacted in South Dakota, Alabama, Arizona, and Kansas.").

54. H.B. 60, 152nd Gen. Assemb., Reg. Sess. (Ga. 2014), <http://www.legis.ga.gov/Legislation/20132014/144825.pdf>; Herbert Buchsbaum, *Amid Wave of Pro-Gun Legislation, Georgia Purposes Sweeping Law*, N.Y. TIMES (Mar. 24, 2014), <https://www.nytimes.com/2014/03/25/us/amid-wave-of-pro-gun-legislation-georgia-proposes-sweeping-law.html> ("The National Rifle Association, which lobbied for the bill, calls it 'the most comprehensive pro-gun' bill in recent state history. . . .").

carry holders to carry concealed weapons in bars, school districts, churches, as well as some state government buildings if they do not possess door security.⁵⁵ Georgia Governor Nathan Deal, a strong supporter of the bill, stated that the law was designed to “protect law-abiding citizens by expanding the number of places that they can carry their guns without penalty. . . .”⁵⁶

When reviewing the events that occurred at Sandy Hook, it has become more apparent to state authorities that the only way to prevent mass school shootings is to allow guns on school campuses.⁵⁷ The facts and circumstances of Sandy Hook show that it was almost completely unpreventable from any type of response from a law enforcement agency: While police urgently responded to the scene within precisely two minutes and forty-one seconds after the initial call to 911, the entire mass shooting only lasted a total of six minutes from the time of first shot until the gunman ultimately committed suicide.⁵⁸

Despite the brevity of the attack, the gunman, without any formal military or law enforcement training, was deadly accurate due to the point-blank range of the attack on students and faculty primarily centered in two separate classrooms of the elementary school.⁵⁹ By the time police entered the school, the lone gunman had already committed suicide.⁶⁰ Despite shooting over twenty-seven students, faculty, and staff, there was only one wounded survivor after the attack.⁶¹

This combination of the swiftness of the attack and resulting death toll is what lead state authorities to reconsider the effectiveness of simply being able to rely on law enforcement agencies. The National Rifle Association’s Executive Vice President, Wayne LaPierre, told the media in the weeks following Sandy Hook that all school districts

55. Larry Copeland & Doug Richards, *Ga. governor signs ‘guns everywhere’ into law*, USA TODAY, <https://www.usatoday.com/story/news/nation/2014/04/23/georgia-gun-law/8046315/> (last updated Apr. 23, 2014, 4:17 PM).

56. Alston & Bird LLP, *What employers need to know about two new Georgia laws*, LEXOLOGY (June 23, 2014), <https://www.lexology.com/library/detail.aspx?g=af89632b-7523-4339-b9df-bbf42a01de94>.

57. Russell, *supra* note 53.

58. Haley Draznin, *Report Supports Police Response Time to Newton Shooting*, CNN, <http://www.cnn.com/2013/12/06/justice/newtown-police-response-school-shooting/index.html> (last updated Dec. 6, 2013, 7:17 PM); *see also* Nichole Mischke, *Photos and Timeline of Events from Sandy Hook Shooting Released*, KHQ (Feb. 22, 2016 5:37 PM), <http://www.khq.com/story/24073207/photos-and-timeline-of-events-from-sandy-hook-shooting-released>.

59. James Barron, *Nation Reels After Gunman Massacres 20 Children at School in Connecticut*, N.Y. TIMES (Dec. 14, 2012), <http://www.nytimes.com/2012/12/15/nyregion/shooting-reported-at-connecticut-elementary-school.html>.

60. Draznin, *supra* note 58.

61. Barron, *supra* note 59.

should consider both armed security as well as training to arm adults at all schools in America.⁶² Questioning whether it was possible to save some or all of the twenty-six lives at Sandy Hook, LaPierre stated, “[t]he only thing that stops a bad guy with a gun is a good guy with a gun.”⁶³

States passing legislation easing gun restrictions due to another state’s mass shooting is a relatively new phenomenon. Within six months after the Sandy Hook shooting, four states had already enacted legislation allowing school faculty to carry firearms in schools K-12.⁶⁴ In comparison, while state legislatures proposed over 800 new bills relating to guns after the Columbine shooting, there was not a single state that allowed guns on campus in direct response to that mass shooting.⁶⁵

Georgia’s Safe Carry Protection Act passed with relative ease through the State Legislature by a 112-58 vote in the House and a 37-18 vote in the Senate.⁶⁶ The law only expands the gun rights of citizens who have passed a background check, are in good standing with the law, and who have obtained a concealed carry license.⁶⁷ While only five percent of Georgia’s population currently possesses a concealed carry license, the purpose of the law was to give added protection “to those who have played by the rules—and who can protect themselves and others from those who don’t play by the rules.”⁶⁸

The Safe Carry Protection Act, however, does not allow any adult, even with a concealed carry license, to legally possess a gun on Georgia school campuses on their own accord. Rather, the Safe Carry Protection Act allows school boards to vote on whether school faculty to bring guns into their school.⁶⁹ Further, if the school board votes to allow faculty to carry, staff members “will go through training that

62. Russell, *supra* note 53.

63. *Id.*

64. *Id.*

65. Jaime Fuller, *After mass shootings, the status quo reigns supreme in Congress*, WASH. POST (May 27, 2014), https://www.washingtonpost.com/news/the-fix/wp/2014/05/27/after-mass-shootings-the-status-quo-reigns-supreme-in-congress/?utm_term=.bc78938510dd; see also Russell, *supra* note 53 (“Before Sandy Hook, no state’s law explicitly permitted firearms on school campuses, though some states had exemptions, according to the NCSL.”).

66. Devon M. Sayers & Elliott C. McLaughlin, *Georgia Law Allows Guns in Some Schools, Bars, Churches*, CNN, <http://www.cnn.com/2014/04/23/us/georgia-governor-signs-gun-bill/index.html> (last updated Apr. 23, 2014, 4:12 PM).

67. *Id.*

68. *Id.*

69. Taylor Berman, *New Georgia Law Will Allow Guns in Schools, Churches, and Courtrooms*, GAWKER (Apr. 23, 2014, 1:40 PM), <http://gawker.com/new-georgia-gun-law-allows-guns-in-schools-churches-a-1566642315>.

includes ‘judgment pistol shooting,’ ‘marksmanship,’ and a review of Georgia’s laws about shooting people to defend yourself and others.”⁷⁰ Also, if the teacher or faculty member does not wish to carry the gun at all times during the day, the staff member would be required to store the gun in a safe or lock box to ensure that students do not have access to the weapon.⁷¹

By emphatically passing the Safe Carry Protection Act, Georgia is fully embracing the motto that “guns save lives” and their own empirical data is supporting that theory. In 1982, Kennesaw, Georgia, a small suburb outside of Atlanta, passed a law requiring heads of households to keep at least one firearm in the house.⁷² The result was that residential burglary rates dropped by a substantial eighty-nine percent.⁷³ While there are certainly distinguishing factors between a small suburban city and the state’s school districts, the statistics from Kennesaw undoubtedly show that the simple threat of gun possession reduces criminal activity at a substantial rate. Therefore, using the same logic, it stands to show that gun possession in schools would also dramatically decrease school shootings as well as overall school violence if potential assailants have the fear that the faculty and staff might possess the capability to properly defend themselves. Similar to a home burglary, police response time to active school shooters on school campuses is not and will not ever be able to be instantaneous. Georgia’s Safe Carry Protection Act will at least allow teachers to defend themselves and their students until law enforcement is able to safely enter the building, and more realistically deter possible assailants from targeting school grounds.

Whether it was due to the efficiency of the attack on Sandy Hook or the culminating effect of re-occurrence of mass school shootings on the news, Sandy Hook shocked Americans everywhere causing a rush of legislation in attempt to protect an exposed vulnerability in America’s school system. It is up to state legislatures to be aware of the relevant facts and statistics and to proactively pass legislation to effectively eliminate school shootings. Georgia’s Safe Carry Protection Act is a proactive response by a state trying to prevent the next Sandy Hook from occurring inside of their school hallways and classrooms.

70. *Id.*

71. *Id.*

72. KENNESAW, GA. CODE OF ORDINANCES ch. 34, art. II, § 34-21 (2017).

73. Larry Pratt, *Open Carry*, GUN OWNERS OF AM. (Apr. 25, 2012), <https://www.gunowners.org/op04252012lp>.

C. Rhode Island

In Rhode Island, anyone with an active concealed carry weapons permit is legally allowed to bring firearms onto school grounds, with or without any association to the actual school, and without knowledge of police or the school itself.⁷⁴ Exempt from this legislation are current students, even if they hold a valid concealed carry permit, as they would still face up to a one year suspension from school if found to have a weapon or a replica in their car or on school grounds.⁷⁵ While states that allow guns on campus are growing in number, what causes Rhode Island to be unique are the political demographics of the state itself. Rhode Island is considered one of the most Democratic-leaning states in the nation with almost a three-to-one Democrat to Republican edge in the most recent voter registration.⁷⁶

Compared to the other states that currently allow some form of firearm possession on school campuses, such as Alabama,⁷⁷ Arkansas,⁷⁸ Colorado, Georgia, Hawaii,⁷⁹ Kansas,⁸⁰ New Hampshire,⁸¹ South Dakota,⁸² Tennessee,⁸³ Texas,⁸⁴ and Utah,⁸⁵ Rhode Island is the only predominantly Democratic-leaning state to enact and support such legislation. According to Colin Woodard's analysis of regional differences in the United States, Northeastern states tend to be more comfortable with government regulation and they tend to value education more

74. R.I. GEN. LAWS § 11-47-11 (1998) (“[t]he licensing authorities of any city or town shall, upon application of any person twenty-one (21) years of age or over . . . issue a license or permit to the person to carry concealed upon his or her person a pistol or revolver *everywhere within this state* for four (4) years from date of issue . . .”); *see also* R.I. GEN. LAWS § 11-47-8 (1998).

75. R.I. GEN. LAWS § 16-21-18 (1995).

76. Micah Cohen, *Rhode Island: The Most Elastic State*, N.Y. TIMES: FIVE THIRTY-EIGHT (Oct. 18, 2012, 10:23 AM), <https://fivethirtyeight.blogs.nytimes.com/2012/10/18/rhode-island-the-most-elastic-state/>.

77. ALA. CODE § 45-30-103(a) (2013).

78. ARK. CODE ANN. § 17-40-102(10) (2015).

79. *See* Mary Ellen Flannery, *States Look to Throw Open School Doors to Concealed Weapons*, NEATODAY (Mar. 26, 2015, 9:53 AM), <http://neatoday.org/2015/03/26/states-look-to-throw-open-school-doors-to-concealed-weapons/>. Hawaii does not statutorily prohibit guns on school K-12. *Id.*

80. KAN. STAT. ANN. § 21-6301(a)(11), (i)(5) (2017).

81. New Hampshire does not statutorily prohibit guns on school K-12. *See* Flannery, *supra* note 79.

82. S.D. CODIFIED LAWS § 13-64-1 (2013).

83. TENN. CODE ANN. § 49-6-815 (2013).

84. Protection of Texas Children Act, H.B. 1009, 83(R) Sess. (Tex. 2013).

85. UTAH CODE ANN. § 53-5-704 (2013).

than other regions.⁸⁶ By significantly lessening government regulation by allowing anyone with a concealed carry permit to possess guns on schools legally, Rhode Island's legislature seems to be at odds with its predominate regional belief.

In comparison, Utah is the only other state that currently allows any concealed carry license holder to carry on school grounds without any formal association to the school itself.⁸⁷ However, guns are a commonplace in Utah, which seem to be intertwined with the historical, conservative landscape of the state.⁸⁸ As such, Utah has the seventh highest number of concealed carry permits issued in the nation, despite having only the thirty-first largest state population.⁸⁹

Rhode Island has broken the mold of states likely to allow guns on campus. Rhode Island has allowed concealed license holders on school campuses with guns for over twenty years and the state has the second fewest gun deaths in the country.⁹⁰ Further, Rhode Island has never experienced gun violence of any kind within its border's school system, further indicating that the state legislation included the exception specially for licensed conceal carry holders as a preventative measure.⁹¹ Rhode Island's inclusion of guns on campus no longer makes pro-gun legislation merely a "Southern" or "Western" cultural identity, but opens up the possibility of other Democratic leaning states to allow guns on school campus in order to prevent mass shootings from occurring, as history would reflect in Rhode Island.

II. OPPOSING ARGUMENTS OF HOW TO COMBAT SCHOOL VIOLENCE

Generally, schools do not have a legal duty to protect their students from violence caused by third parties.⁹² There are several

86. Wilson, *supra* note 18.

87. UTAH CODE ANN. § 53-5-704 (2017).

88. See Frank Newport, *Alabama, North Dakota, Wyoming Most Conservative States*, GALLUP (Feb. 1, 2013), <https://news.gallup.com/poll/160196/alabama-north-dakota-wyoming-conservative-states.aspx> (noting Utah as the fifth most conservative state as of 2012).

89. *Concealed Carry Permits by State*, GUNS TO CARRY (2017), <https://www.gunstocarry.com/concealed-carry-statistics/>; *State Populations 2017*, WORLD POPULATION REVIEW (2017), <http://worldpopulationreview.com/states/>.

90. Amanda Milkovits, *R.I.'s Gun Death-Rate Second Lowest in the U.S.*, PROVIDENCE J. (Jan. 4, 2016, 11:15 PM), <http://www.providencejournal.com/article/20160104/NEWS/160109728>.

91. *History of School Shootings in the United States*, K12 ACADEMICS, <http://www.k12academics.com/school-shootings/history-school-shootings-united-states#.WgifP7Cpmrc> (last visited Dec. 6, 2017).

92. *Morrow v. Balaski*, 719 F.3d 160, 170 (3d Cir. 2013) (holding that public schools do not have a constitutional duty to protect students from harm from third parties unless there is a "special relationship" between the school and the student). A "special relationship" is

arguments as to why arming teachers would be a bad idea: (1) students would find a way to access the guns,⁹³ (2) teachers will misuse them either prematurely or through misfires,⁹⁴ or (3) that faculty and staff are role models for children and if they bring weapons on school, so will children.⁹⁵ As a result, a number of alternative measures have been suggested to prevent mass shootings. This section will analyze the commonly referred alternative measures individually.

A. *Metal Detectors*

Metal detectors certainly serve the function of a risk reducer for violence in schools. Currently, metal detectors have been slowly increasing in popularity. They are especially common for low-income, urban school districts.⁹⁶ As of 2015, twelve percent of public school students reported that their school used metal detectors, up from only nine percent in 2014.⁹⁷ Another four percent of students indicated that their school used random metal detectors checks throughout the school year.⁹⁸ Metal detectors are very accurate in detecting most knives and guns,⁹⁹ which could give reassurance to parents who send their children to school if the presence of weapons was detected prior to entering onto school grounds.

However, metal detectors also come with several obstacles before schools can effectively implemented them as a reliable violence prevention tool. First, a walk-through metal detector costs on average

defined as when the state takes custody of the child and holds them against their will. *Id.* at 167-68.

93. Ken Corbett, *Arming Teachers: Three Reasons Why Teachers Should Not Carry Guns in Schools*, HUFFINGTON POST (Apr. 10, 2013, 1:30 PM), https://www.huffingtonpost.com/2013/04/10/arming-teachers-three-reasons_n_3053291.html.

94. Steven Singer, *Allowing Guns in School is a Bad Idea*, COMMON DREAMS (Mar. 5, 2017), <https://www.commondreams.org/views/2017/03/05/allowing-guns-schools-bad-idea>.

95. Kathleen McGrory, *Guns at School? Florida proposal would allow armed teachers*, TAMPA BAY TIMES (Mar. 28, 2013), <http://www.tampabay.com/news/education/k12/guns-at-school-bill-would-allow-armed-teachers/2111551>.

96. See Joe Robertson, *Metal detectors in schools: Source of safety or anxiety?*, KAN. CITY STAR, <http://www.kansascity.com/news/local/article2680258.html> (last updated Oct. 12, 2014, 9:16 PM) (“Students from households making less than \$15,000 a year are nearly four times more likely to go through [a metal detector] than those from households earning \$50,000 or more.”).

97. LAUREN MUSU-GILLETTE ET AL., BUREAU OF JUST. STAT., DEP’T OF EDUC., INDICATORS OF SCHOOL CRIME AND SAFETY: 2016, 118 <https://nces.ed.gov/pubs2017/2017064.pdf>.

98. *Id.* at 112.

99. Brandon Allred, *All you need to know about metal detectors*, PROTECTIVE TECHNOLOGIES INT’L. (Feb. 13, 2013), <https://www.pti-world.com/all-you-need-to-know-about-metal-detectors/>.

\$ 3500 and additionally each handheld wand costs \$ 150.¹⁰⁰ While companies who sell metal detecting units to schools provide free training to any school personnel, an employee who is qualified to operate the machine must seize a weapon should a one be detected.¹⁰¹ Further, there is the additional cost of routine maintenance and eventual system upgrades. Second, it takes a considerable amount of time to get hundreds, sometimes thousands, of students plus their bags through security, which could have a negative effect on the ability to get all students into their classrooms in a timely manner. Lastly, to be effective, all other doors and windows must be secured to prevent students from passing weapons through to classmates who have already cleared through security.¹⁰²

By controlling all ingress and egress to and from the school, many fear that such an atmosphere could cause a “prison-like” environment for the students themselves.¹⁰³ The cost of the machinery itself plus the additional manpower required to operate each machine are the leading contributors as to why metal detectors are not currently being used regularly in almost ninety percent of our nation’s schools.

B. Armed Security Guards

School districts and local law enforcement have been increasingly collaborating to increase school safety either through armed security guards or assigned police officers. Having an armed presence on school grounds would allow for quicker response times as well as a possible deterrent to violent behavior. In 2015, at least fifty percent of students reported the use of armed security guards or assigned police officers in their schools.¹⁰⁴ However, it would appear these numbers are inflated, as the question used by the Department of Education was regarding the presence of armed personnel for only one week during the school year.¹⁰⁵ The Department of Education did not release statistics on the frequency of use of armed personnel outside of the minimum requirement of at least one week during the school year.

100. Lindsay Corcoran, *Metal detectors in our schools: How much do they cost?*, MASS. LIVE (May 13, 2015), http://www.masslive.com/news/worcester/index.ssf/2015/05/metal_detectors_in_our_schools.html.

101. *Id.*

102. *School Metal Detectors*, NAT’L SCH. SAFETY & SECURITY SERV., <http://www.schoolsecurity.org/trends/school-metal-detectors/> (last visited Dec. 6, 2017).

103. *Id.*

104. MUSU-GILLETTE ET AL., *supra* note 97, at 118.

105. *Id.* at 199.

Similar to the use of metal detectors, an armed security presence also includes numerous drawbacks. In 2016, there were nearly 130,000 schools K-12 in the United States with an approximate enrollment of 54,876,000 total students.¹⁰⁶ Conservatively, if each school hired only one full-time armed security guard at the national average base pay,¹⁰⁷ this would amount to an annual expense of \$3,7770,260,000.00. Further, this cost would only give each school a 1:422 security guard to student ratio, which is the national average student enrollment in schools K-12. With this high of a student to security guard ratio, there would be plenty opportunity for a deadly incident to occur.

Further, even with this annual expense, there would be no assurance that armed security would be able to prevent a mass shooting. For example, there was an assigned sheriff's deputy to Columbine on duty on the day of the infamous attack.¹⁰⁸ While the Columbine deputy was able to be on scene within five minutes, call for immediate police support, and even exchange gunfire with one of the assailants, the sheriff had limited effect to neutralize the threat while being ordered to remain outside of the school while there was an active shooter.¹⁰⁹ Also, with nearly ninety-five percent of all school mass shooters planning their attack in advance,¹¹⁰ it is very logical that assailants would attempt to avoid striking when and where armed security guards are patrolling.

C. Student Profiling

In direct response to previous mass shootings at schools, many principals and teachers have turned to profiling students in an attempt to identify violent behavior at an early stage. In fact, the Department of Education published a guide highlighting sixteen different behaviors for educators to identify that may indicate that a child is potentially dangerous.¹¹¹ Today, student profiling has been updated to monitor

106. *K-12 FACTS*, CTR. FOR EDUC. REFORM (Feb. 2016), <https://www.edreform.com/2012/04/k-12-facts/>.

107. *Armed Security Officer Salaries*, GLASSDOOR (Dec. 6, 2017), https://www.glassdoor.com/Salaries/armed-security-officer-salary-SRCH_KO0,22.htm (noting that in 2018, the national average salary for armed security officers was \$27,510 per year).

108. See Kohn, *supra* note 25.

109. *Id.*

110. VOSSEKUIL ET AL., *supra* note 5, at 23-24.

111. KEVIN P. DWYER ET AL., U.S. DEP'T OF EDUC., EARLY WARNING, TIMELY RESPONSE: A GUIDE TO SAFE SCHOOLS 8-11 (1998), <https://files.eric.ed.gov/fulltext/ED418372.pdf>.

computer software programs as an additional tool to identify possible violent students.¹¹²

However, the Secret Service studied mass shooters for nearly five years and they were unable to identify a single “accurate or useful ‘profile’ of students who engage in targeted school violence.”¹¹³ Some of the factors the Secret Service analyzed included: (1) family situations, (2) demographic and background characteristics, (3) academic success, (4) social relationships, (5) school disciplinary problems, and (6) changes in academic performance.¹¹⁴

The most conclusive characteristics found by the Secret Service was that the assailants were typically white males, between the age of thirteen and eighteen, and they typically carried out the attack alone.¹¹⁵ Surprisingly, the Secret Service found that many of the assailants were strong students who generally received As and Bs in coursework (41%); were involved in organized social activities either in or outside of school including sports teams, school clubs, or religious groups (44%); and nearly two-thirds of the attackers had never been in trouble or were rarely in trouble at school (63%).¹¹⁶

Due to the lack of a single useful profile, many schools have mistakenly labeled nonviolent students as violent and have misidentified violent students as “safe.”¹¹⁷ Organizations such as the National Association of Secondary School Principals are actively recommending that educators abstain from profiling students as a means to identify violent students.¹¹⁸ Considering that trained analytics professionals from the Secret Service were unable to identify a useable profile, it is unfounded that teachers, without any formal training or experience, would be able to accurately profile potentially dangerous students.

D. Anti-Bullying Instructional Programs

Bullying is a significant issue in America’s school system with statistics showing that more than twenty percent of students report

112. *Student Profiling*, CTR. FOR THE STUDY & PREVENTION OF VIOLENCE (2000), <https://www.colorado.edu/cspv/publications/factsheets/positions/PS-004.pdf>.

113. VOSSEKUIL ET AL., *supra* note 5, at iii, 11.

114. *Id.* at 19-21.

115. *Id.* at 15, 19.

116. *Id.* at 20.

117. *Student Profiling*, NAT’L ASS’N OF SECONDARY SCH. PRINCIPALS (July 12, 2001), <https://www.nassp.org/who-we-are/board-of-directors/position-statements/student-profiling?SSO=true>.

118. *Id.*

being bullied on a yearly basis.¹¹⁹ The United States government defines bullying as “unwanted, aggressive behavior among school aged children that involves a real or perceived power imbalance.”¹²⁰ Most would agree that in order to have a secure atmosphere for learning, bullying has no place in our school system. However, the issue remains on how to effectively prevent bullying from occurring.

Unsurprisingly, the Secret Service also found that nearly seventy-one percent of school attackers “felt persecuted, bullied, threatened, attacked or injured by others prior to the incident.”¹²¹ This would indicate that the use of anti-bullying programs would be extremely beneficial in preventing mass school shootings. Unfortunately, researchers have found inconclusive results about the actual success of previously administered anti-bullying programs.¹²² In an eight-year study of 7,000 students aged twelve to eighteen, researchers from the University of Texas and Michigan State University found that students who attended schools with anti-bullying programs experienced more bullying than students at schools without those programs.¹²³

The scientists were unable to explain the results of their research and rationalized that perhaps anti-bullying programs actually taught students more effective bullying techniques rather than preventing them.¹²⁴ Based off the Secret Service’s finding of a strong correlation between bullying and school shootings, anti-bullying programs could be the most effective method of preventing school attacks. Unfortunately, the research shows that anti-bullying programs are far too unreliable as a primary prophylactic measure in their current state.

III. EFFECTIVENESS OF ALLOWING SCHOOL FACULTY TO CARRY FIREARMS

In contrast to the opposing arguments previously mentioned, states allowing guns on campus have enjoyed a secure learning environment in a reasonable, cost-efficient manner. To date, no state that

119. *Bullying statistics*, NAT’L BULLYING PREVENTION CTR., <http://www.pacer.org/bullying/resources/stats.asp> (last updated Dec. 27, 2017).

120. *What is Bullying*, U.S. DEP’T OF HEALTH AND HUM. SERVICES, <https://www.stopbullying.gov/what-is-bullying/index.html>.

121. VOSSEKUIL ET AL., *supra* note 5, at 21.

122. Amanda Oglesby, *Researchers unsure of success of anti-bullying programs*, USA TODAY, <https://www.usatoday.com/story/news/nation/2014/03/20/anti-bullying-programs-may-give-boost-to-bullies/6653995/> (last updated Mar. 20, 2014, 2:13 PM).

123. *Id.*

124. *Id.*

currently allows arming individuals on school campuses K-12 has faced a live-shooter situation since the state has passed legislation legally allowing guns on their school grounds.¹²⁵ While the sample size for this statistic is relatively minute, especially compared to the long history of mass school violence in the United States,¹²⁶ the data and statistics, or lack thereof, clearly exemplify that by legally allowing guns on school campuses, state legislatures have developed a reliable deterrent against school shootings in their respective states.

The threat that school staff members might legally possess guns in their classrooms, and the power of the unknown to potential attackers as to exactly which school staff members carry weapons, is evidently sufficiently deterring attacks from occurring in these states' schools. Potential assailants can no longer plan that they will be the only person in the school with a gun. In fact, the assailants might even be outnumbered. Since ninety-five percent of all mass school shootings are planned, sometimes down to intimate details, these potential assailants can no longer achieve their goal of killing the most amount of people in the least amount of time by targeting schools because of their vulnerabilities as gun-free zones.

This result, however, should not come as a surprise. After the attack at the Fort Lauderdale-Hollywood International Airport in Florida that took the lives of five people at the baggage claim, the Crime Prevention Research Center conducted a study on the physical locations of mass shootings in the United States.¹²⁷ The study found that from the 1950's until July 10th, 2016, over ninety-eight percent of all mass shootings occur in gun-free zones,¹²⁸ such as schools, airports, government buildings, and bars or nightclubs.

A valid counterargument could be made that since many of these states only enacted legislation following the Sandy Hook shooting in 2012, that the lack of school shootings may be more indicative of a lack of a sample size, rather than actual gun violence prevention.

125. See Danielle Weatherby, *Opening the "Snake Pit": Arming Teachers in the War Against School Violence and the Government-Created Risk Doctrine*, 48 CONN. L. REV. 119, 124 (2015); see also *United States school shootings, 1990 – present*, BALLOTPEDIA, https://ballotpedia.org/United_States_school_shootings,_1990-present (last visited Dec. 6, 2017).

126. K12 ACADEMICS, *supra* note 91 (“The earliest known United States shooting to happen on school property was the Pontiac’s Rebellion school massacre on July 26, 1764, where four Lenape American Indian entered the schoolhouse near present-day Greencastle, Pennsylvania, shot and killed schoolmaster Enoch Brown, and killed nine or ten children (reports vary). Only two children survived.”).

127. Brandon Morse, *Over 98% of mass shootings occurred on gun-free zones, research shows*, THEBLAZE (Jan. 9, 2017, 8:39 PM), <http://www.theblaze.com/news/2017/01/09/over-98-of-mass-shootings-occurred-on-gun-free-zones-research-shows>.

128. *Id.*

However, the gun control debate is not new, and data from cities and all the way up to entire nations further supports the concept that lawfully obtained guns save innocent lives and act as a deterrent for violent crimes.

Take Washington, D.C. for example: During the city's gun ban between 1990 through 1995, the city averaged more than 430 homicides per year and was given the nickname of America's "Murder Capital."¹²⁹ By 2012, less than four years after the Supreme Court's landmark decision in *District of Columbia v. Heller*,¹³⁰ the city experienced eighty-eight total murders, nearly an eighty percent decrease in yearly homicides as well as the city's lowest total murder rate since 1963.¹³¹

Further evidence can also be derived from the city of Chicago, which is considered to be the largest gun-free zone in the United States due to having the strictest gun laws in the nation, at least for law-abiding citizens.¹³² The result has been that in 2016 Chicago experienced more gun violence than both Los Angeles and New York combined, despite having a smaller total population than either of those cities.¹³³ To put that into context, there were actually more murders in Chicago from 2001 to 2016 than the total number of deaths of American soldiers in Afghanistan and Iraq combined during the same time frame.¹³⁴

Many of the school mass shooters, such as the assailants from Columbine High School and Sandy Hook Elementary, did not have specific targets in mind. Rather, the attackers were trying to kill as many people as possible in the shortest amount of time before law enforcement arrived. These were dangerous individuals who wanted to harm

129. *Post-Heller D.C. Continues to Experience Historically Low Homicides*, NRA-ILA (June 6, 2014), <https://www.nraila.org/articles/20140606/post-heller-dc-continues-to-experience-historically-low-homicides>.

130. 554 U.S. 570 (2008).

131. See Brian Doherty, *D.C.: More Legal Guns, Far Fewer Murders, Despite Post-Heller Fearmongering*, REASON (Dec. 11, 2012, 9:40 AM), <http://reason.com/blog/2012/12/11/dc-more-legal-guns-far-fewer-murders-des>.

132. JD Heyes, *Homicides explode in gun-free Chicago*, LIBERTY (May 20, 2016), <http://www.liberty.news/2016-05-20-homicides-explode-in-gun-free-chicago.html>.

133. Julie Bosman & Mitch Smith, *As Chicago Murder Rate Spikes, Many Fear Violence Has Become Normalized*, N.Y. TIMES (Dec. 28, 2016), <https://www.nytimes.com/2016/12/28/us/chicago-murder-rate-gun-deaths.html>.

134. Niall McCarthy, *Homicides in Chicago Eclipse the U.S. Death Toll in Afghanistan and Iraq*, FORBES (Sept. 8, 2016, 8:46 AM), <https://www.forbes.com/sites/niallmccarthy/2016/09/08/homicides-in-chicago-eclipse-u-s-death-toll-in-afghanistan-and-iraq-infographic/> ("Since 2001, Chicago has experienced 7,916 murders (as of September 06, 2016). The number of Americans killed in the wars in Afghanistan and Iraq was 2,384 and 4,504 respectively since 2001.").

the largest amount of people possible. To accomplish their goal, the assailants targeted gun-free zones, that is where they knew that they would receive the least amount of resistance. The threat of armed faculty and staff at schools K-12 is apparently acting as enough of a deterrent that mass shootings have not occurred in any of these states in the past five years.

IV. FUTURE USE OF GUNS IN SCHOOLS K-12

While mass shootings are becoming deadlier, the rate of mass shootings has remained rather consistent the past thirty years.¹³⁵ Fortunately, most American schools are taking the necessary steps in preparing for a mass shooter. In addition to fire drills, approximately two-thirds of schools conduct active shooter exercises, and nearly all schools have a plan in place if a shooter does come on campus¹³⁶

Currently, most schools have a “lock-down” policy in the event of an active shooter. The idea is to stop all free movement by locking exterior and interior doors while the children are under direct supervision of their teachers.¹³⁷ The idea is that this will keep panic to a minimum and all students accounted for. Because of this, the future of gun safety on schools K-12 will most likely be the eventual installation of bullet resistant glass and electronic locking doors to prevent access into a school building or classroom by a shooter. Currently, the cost of this technology is preventing its widespread use throughout the country with an approximate cost of \$ 30,000 to retrofit any single school building with bullet resistant glass.¹³⁸

Until that time, more states will allow guns on schools until research indicates that there are more cost-effective, reasonable means to effectively deter gun violence. Currently, Florida lawmakers are

135. See Grant Duwe, *Mass Shootings Are Getting Deadlier, Not More Frequent*, POLITICO (Oct. 4, 2017), <https://www.politico.com/magazine/story/2017/10/04/mass-shootings-more-deadly-frequent-research-215678>.

136. Nicole Chavez & Alaa Elassar, *How active shooters are changing school security in the US*, CNN, <http://www.cnn.com/2017/11/15/health/active-shooters-school-security/index.html> (last updated Nov. 15, 2017, 7:23 AM).

137. See *Best Practices for Campus and School Lockdown Procedures*, PROTECTION 1 <http://www.protection1.com/campus-safety/school-lockdown-procedures/> (last visited Apr. 4, 2018).

138. *Schools Upgrading to Bullet Resistant Glass After Newton Tragedy*, TOTAL SECURITY SOLUTIONS (Mar. 12, 2013), <https://www.tssbulletproof.com/blog/bullet-resistant-glass-upgrades-for-school/>.

looking to eliminate all gun-free zones in the state;¹³⁹ Michigan recently enacted legislation allowing concealed guns onto schools K-12;¹⁴⁰ and ten states already allow concealed weapons on college campuses without requiring school approval.¹⁴¹

However, no matter an individual's stance on gun control in the United States, one thing is certain; K-12 school faculty and staff in all regions of this country are spending their own time and money to voluntarily train to put their own lives at risk in order to potentially save someone else's child one day. While there is probably no perfect system, what educators have already accomplished in order to make schools safer cannot go unacknowledged or without merit after their contribution and dedication to helping and protecting our youth.

139. Kate Wheeling, *Florida Lawmakers Want to Get Rid of Gun-Free Zones*, PACIFIC STANDARD (Feb. 15, 2017), <https://psmag.com/news/florida-lawmakers-want-to-get-rid-of-gun-free-zones>.

140. Emily Lawler, *Michigan Senate votes to allow concealed guns in school*, MICH. LIVE (Nov. 8, 2017), http://www.mlive.com/news/index.ssf/2017/11/michigan_senate_votes_to_allow.html.

141. *Guns on Campus Overview*, NCSL (Aug. 14, 2018), <http://www.ncsl.org/research/education/guns-on-campus-overview.aspx>.