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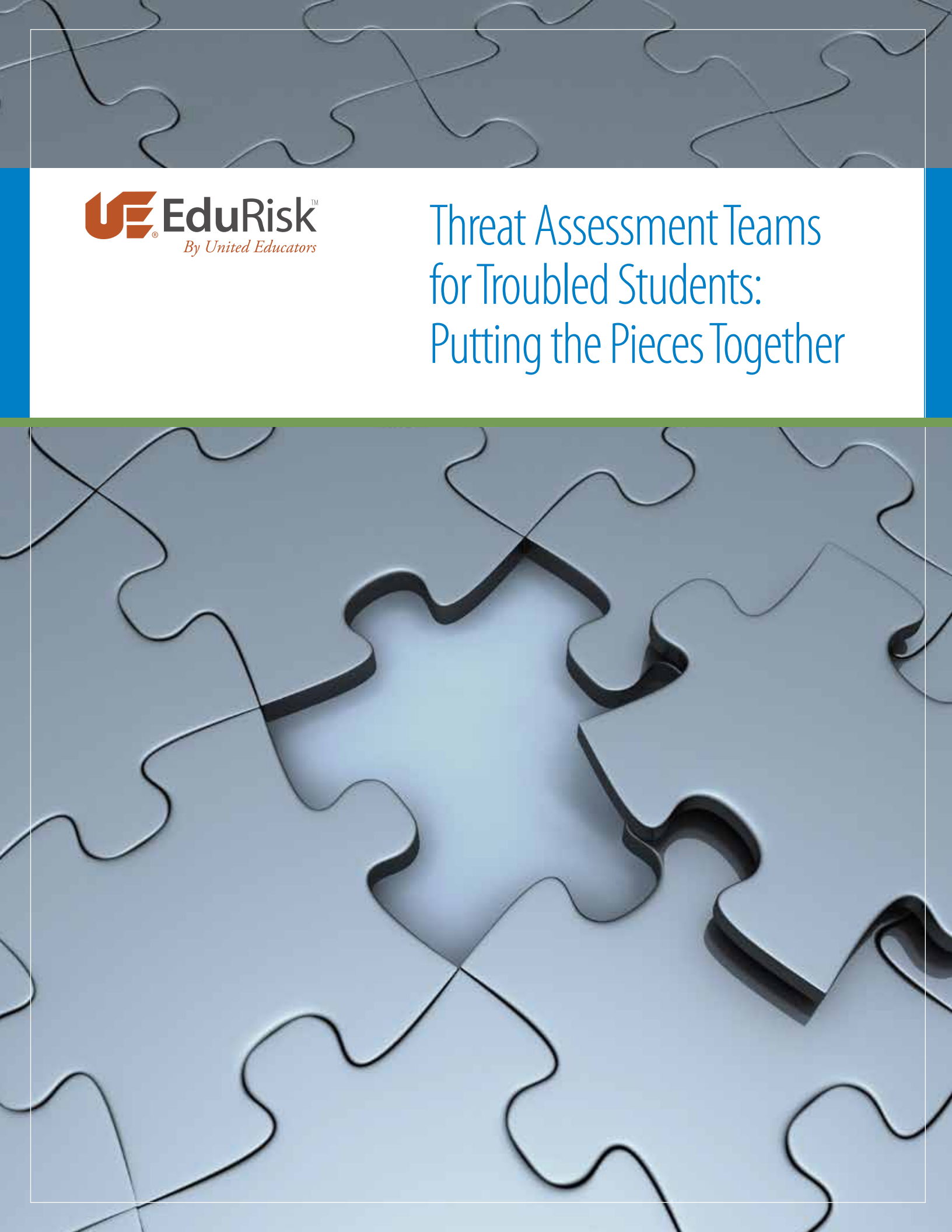
By United Educators

Threat Assessment Teams for Troubled Students: Putting the Pieces Together



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Introduction

The U.S. Department of Education, the Secret Service, and the Federal Bureau of Investigation (FBI) agree: The use of threat assessment teams is a sound method for identifying and responding to distressed students in educational settings. In 2002, the Department of Education and the Secret Service issued the report of the Safe School Initiative (SSI), a study that examined "the thinking, planning, and other pre-attack behaviors engaged in by attackers" who previously had carried out shootings in K-12 schools. The joint study concluded that individual attackers do not simply "snap" before engaging in violence; rather, they often engage in observable behaviors that signal an attack is about to occur. The SSI report recommends that schools adopt a threat assessment process and a team to implement it to prevent school violence.

In reaction to campus shootings since 2007, many higher education institutions are creating or modifying existing threat assessment teams based on recommendations from the SSI report as well as more recent reports examining campus security. Threat assessment teams do more than help prevent campus shootings. Their primary function is to identify and coordinate services for a broad range of troubling student behaviors, including mental illness, substance abuse, and disruptive conduct.

Different colleges and universities call their teams by a variety of names, such as Assessment and Care Team, Behavioral Evaluation Team, Student Concern Team, and Alert Team. Regardless of the name, the core functions are generally the same. These teams:

- Receive reports of troubling student behavior
- Strive to understand a troubled student's life by gathering information from team members and other available resources
- Evaluate the facts to determine whether a student poses a risk of harm or is in need of additional assistance
- Recommend an intervention that connects the student to beneficial resources or de-escalates the threat posed, or both

Discussions with administrators and other staff at dozens of colleges and universities reveal that many practices are commonly used to help team members identify, intervene with, and manage distressed, disruptive, or potentially violent students. Following are highlights from these discussions with deans of students, heads of counseling, campus law enforcement officers, legal counsel, risk managers, and officials involved with student discipline and student medicine. These personnel offered practical suggestions and reflections in four areas critical to the success of an institution's student threat assessment team:

- Forming a threat assessment team
- Reporting student behavioral concerns
- Assessing and intervening with students of concern
- Sharing and documenting information

Forming a Threat Assessment Team

With students' health and welfare at risk, an institution's threat assessment team must be able to get to work as soon as the need arises. This requires organization and planning long before there are indications of trouble. Here are several steps that institutions take to ensure a well-functioning team.

Lay the Foundation

Reasons for a Team

The concept of threat assessment teams in education is not new or untested. Some higher education institutions have had teams for more than 20 years. Many colleges and universities have established workplace violence teams but not student threat assessment teams.

Since 2002, the Department of Education, Secret Service, and FBI have recommended threat assessment teams as a way of preventing school shootings and promoting a safe school climate.[1] An updated study of the SSI, now under way, will examine acts of targeted violence that have occurred at colleges and universities and apply the threat assessment process to higher education institutions.

Teams are also valuable from a liability perspective. In 2008, Virginia and Illinois passed laws requiring in-state colleges and universities to create threat assessment teams. Several public and private entities that reviewed campus security in the aftermath of the Virginia Tech shootings recommended that colleges and universities create such teams.[2] The strong support for the creation of threat assessment teams is likely to shape a court's interpretation of an institution's duty of care to respond to student behavior.

Through the eyes of the law, all campus personnel are representatives of the institution whether they are from the same or different departments. As representatives of the institution, each employee's knowledge of a student is generally attributable to the institution. Once an institution has knowledge or notice that an aspect of

1 One of the recommendations to come out of the Safe School Initiative (SSI) was that educational institutions should adopt a threat assessment process to prevent targeted violence at schools. In the compendium guide to the SSI, *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates*, the Secret Service and the Department of Education recommend creating multidisciplinary teams to perform the threat assessment process and to create a safe school climate. Similarly, the FBI also issued a report, *The School Shooter: A Threat Assessment Perspective*, that recommends the creation of multidisciplinary teams at schools to conduct the threat assessment process and prevent violent attacks.

2 These entities include the U.S. Departments of Education, Justice, and Health and Human Services; the National Association of Attorneys General; the International Association of Campus Law Enforcement Administrators; and state task forces from California, Florida, Illinois, Iowa, Massachusetts, Missouri, New Jersey, North Carolina, Oklahoma, Virginia, and Wisconsin.

a student's behavior is of concern, the law charges the institution with a duty to respond reasonably to that issue. This is true even if an employee has not shared knowledge about a student with others, and it means that institutions likely will be legally responsible for making coordinated and informed decisions regardless of whether any coordination has occurred. If there is poor communication among different campus departments and an institution's response to student behavior is ineffective, a court may view this as compelling proof of negligence—especially in light of the recent reports recommending the creation of campus threat assessment teams.

Multidisciplinary representation on teams promotes informed and coordinated decision making, thereby increasing the likelihood of an early intervention with students who are distressed or struggling. Institutions do not have to wait until there is a crisis that would trigger a response by the student discipline, criminal, or civil system. Rather, they can intervene when there are lesser but still troubling behaviors by students and possibly prevent a downward spiral that could result in a student's self-destructive act or harm to others. Early intervention can help provide students with needed resources in a timely fashion.

Team Objectives

Threat assessment teams typically serve the following functions:

- Provide a repository for information about student behavioral concerns across different campus departments to identify students in distress as early as possible
- Facilitate timely communication among different campus departments about individual student behavioral concerns
- Investigate or gather additional information about individual students of concern
- Assess the information so that the institution can devise an appropriate response
- Recommend interventions and case management strategies that connect students with needed resources and de-escalate any threat
- Assist in educating the campus community about the types of behavior or concerns that they should report to team members

Some teams or their related oversight committees also perform the following functions:

- Investigate behavioral issues of nonstudents, such as those presented by former students, parents of students, student acquaintances, significant others, campus visitors, or faculty and staff. Because threats to campus safety can arise outside the student population, some institutions expand their team's focus to include reports of concerning behaviors from many different constituencies.
- Develop policy recommendations based on an evaluation of data on student behavior dealt with by the team. By monitoring students' behavioral issues handled by the team, institutions can make targeted improvements in different campus policies and practices. For example, if a team notices that most troubling behavior arises from graduate-level

students, they may suggest different initiatives focused on improving the graduate curriculum or learning environment.

- Coordinate with related campus groups or committees (such as the institution's crisis response committee or sexual assault team) on matters that could affect other committees by, for example, sharing trend data or discussing methods for improving team protocols. Depending upon the desired level of coordination, this communication may be facilitated by common members of related committees, a standing joint-committee meeting, or simply regular conversations between team members.

Many teams do not have disciplinary authority and remain focused on serving as a triage mechanism. This approach is beneficial because it avoids:

- **Inconsistent results.** An institution would not need, for example, two student judicial processes, one for the threat assessment team and the other for the college's standing student judiciary body. Such a circumstance could lead to duplication and conflict. From a liability perspective, conflict between two processes could make the institution appear negligent of violating its own policies.
- **Chilling effect on reporting.** Disciplinary authority can have a chilling effect on the reporting of information. People would be less likely to report behaviors to the team if that report would potentially get the subject in trouble.
- **Supplanting the expertise of others.** The job responsibilities of many team members do not include authority to discipline students. When a threat assessment team is given authority to take administrative actions against students, team members then supplant job functions assigned to others with greater knowledge and expertise to discipline students in accord with the institution's policies and procedures.

Pre-Existing Multidisciplinary Relationships

Most institutions have some multidisciplinary coordination among departments, which can serve as a model for the threat assessment team. Examples of naturally occurring multidisciplinary relationships on campus include:

- A workplace violence team
- A close relationship among two or more of the following: student discipline, student affairs, student counseling or medicine, housing, and security
- An institution's sexual assault team that coordinates with security, student health, the women's and men's centers, or student discipline

Create the Team

Team Name

Most teams handle a broad array of student issues, not just violence, and their names reflect that. Preferred titles accurately reflect the team's ability to receive and respond to all types of student behaviors. By omitting or de-emphasizing the word *threat*, students are not unfairly stigmatized and any chilling effect on reporting is reduced. Sample team names include:

- Student Coordination Committee (SCC)
- Behavioral Evaluation and Threat Assessment Team (BETA)
- Alert Team
- Student Assistance, Facilitation, and Evaluation Team (SAFE)
- Behavioral Intervention Team (BIT)
- Assessment and Care Team (ACT)
- Campus Intervention Team (CIT)
- Student Review Team (SRT)
- Student Concerns Team (SCT)

Team Size

Student threat assessment teams work well when they have five to 20 members. Because one of the team's primary objectives is to gather information about a troubled student's life, different campus functions will have different pieces of information that need to be compiled to form a complete picture.

A group with fewer than five members could have difficulty fostering the needed communication among various campus constituencies. Greater pressure would fall on the few members to gather information themselves. Team members may overlook some data if they do not adequately cull information from the larger campus community. Too small a group also is susceptible to communication biases and preferences of its members. The group risks becoming insular in its decision making and may believe it is making informed decisions, when, in fact, its members lack necessary information.

Larger groups benefit from regular interaction among a broader array of representatives from different campus departments. Ongoing team participation improves each member's understanding of the different campus departments and their interrelationships. Better communication and coordination allow team members to gain a fuller understanding of a student's life. With the increased coverage across campus functions, a larger group can help prevent troubled students from manipulating different campus administrators and perpetuating the behavioral problem.

While a small team may assemble more easily to respond to situations, many larger teams do not find that their size creates a problem. Rather, a team's inexperience or lack of history can form the basis for problems. Newer teams may experience some difficulties in developing team chemistry and overcoming personality conflicts, but such problems often dissipate with long-established teams. Although it may take longer to develop lines of communication with more team members, this hurdle is surmountable. Once overcome, teams tend to find no difficulty in assembling and communicating in a timely manner.

Twenty is as large as a team should be. It becomes increasingly difficult to assemble a team that is too large, and many team members may not have relevant information on a majority of the cases. Their participation would be an ineffective use of time and resources and could elicit questions about sharing a student's information with more people than necessary. A solution is to establish a smaller standard team and consult additional people from different campus departments as needed. Pertinent information would be shared by campus departments that are not represented on the team but only called when necessary to benefit a student or the campus.

Where an institution falls on the five-to-20 member spectrum will depend on size, resources, and culture. Each institution has to strike its own balance. Institutions need to seek involvement that adequately represents their different campus departments but still keep the team small enough to act quickly, share essential information, and efficiently use resources.

Team Composition

Different institutions will include different departments on the team depending on their staff positions and responsibilities. For example, one institution may have a director of student retention, while another does not. An institution's general counsel may handle real estate or corporate law, which has no relevance to the committee, but counsel at another college may work with student affairs. The committee should reflect each institution's staffing and structure.

Departments *critical* to the team's function: At a minimum, an institution should consider representation from the departments that primarily interact with

students on a variety of issues.[3] The most critical departments include:

- **Student affairs** has its finger on the pulse of student activities and behaviors and is best poised to communicate directly with students in need or their families.
- **Judicial affairs** has knowledge about students against whom disciplinary action is sought or considered and brings an understanding of the range of potential disciplinary or administrative actions an institution can invoke to intervene with struggling students.
- **Residence life** can be a prime source of information about the behavior of students living in or visiting campus residence halls.
- **Mental health services** can receive information although professional standards of confidentiality prevent them from disclosing client information.[4] Team discussions can help professionals make informed decisions about whether it is appropriate to break a client's confidence, and when the team discusses people who are not clients, the mental health practitioners can provide valuable insight into potential interventions.
- **Student health** professionals cannot divulge patient information because of professional ethics, but their medical training and experience are valuable in providing perspectives on identifying and responding to students in distress. They can be a key ally in building relationships with the institution and community health providers, such as the local hospital or state mental health facilities.
- **Public safety** can offer information about incidents of criminal activity, persons demonstrating suspicious but noncriminal behavior, responses to medical situations, and welfare checks on students of concern. Public safety's experience and training are valuable in responding to and assessing potentially violent behaviors or behaviors that rise to or involve a criminal response. An institution without a robust campus safety department should develop a relationship with its municipal police department and consider placing a police representative on the team.
- **Academic affairs** is both a source of important student information and an ally in ensuring implementation of the team's intervention strategies. Also, faculty members would likely seek out this representative to discuss any concerns over troubling student classroom behavior.

Departments *helpful* to the team's function: Some institutions may also consider including the following personnel on their team:

- **Legal affairs** can provide advice on legal issues that affect the team's function, such as permissible information sharing and documentation practices, thereby empowering the team to take actions and share information when there is a fear (whether real or perceived) of legal issues. Counsel can also provide advice to reduce liability risks associated with a team's actions.

3 In Virginia and Illinois, state laws passed in 2008 require public higher education institutions to create threat assessment teams. The Virginia law requires that the team contain representatives from the departments of residential life, academic affairs, law enforcement, the counseling center, and student judicial affairs.

4 In most states, the professional standards for client confidentiality that apply to mental health practitioners prohibit them from disclosing, without client consent, any client information (to include whether an individual is a client) unless there is a substantial threat of death or severe bodily harm.

- **Disability resources** has knowledge of students who are classified as disabled and can suggest appropriate responses and accommodations. These personnel can also help to ensure that the team's recommended strategy does not run afoul of federal and state disability laws.
- **Risk management** professionals who manage an institution's claims and risks can be helpful in guiding its response to different student situations while limiting the institution's liability exposure.
- **Public affairs** professionals can advise the team on providing information about the team's actions to the media and its campus audiences.

Additional departments the team may involve: The team may want to consult with several other departments and personnel in appropriate cases, such as student outreach or student retention, athletic director or administrator, sports medicine, ombudsman, women's and men's center, faculty advisor, office of international students, president's office, or chaplain.

Additional personnel to consider: A decision to include one or more other personnel often depends upon their expertise, willingness, and personalities. Here are some questions to consider in deciding whether to add a representative of a campus department on the team:

- Is this person or department an important source of information about an area of student life?
- Is this person or department knowledgeable about liability issues affecting the institution?
- Is the person influential, and does his or her scope of influence have an impact on the team's decisions on a regular basis?
- Is the individual one who builds and maintains relationships across disciplines and departments?
- Does this person have the ability to get along, communicate, and coordinate to achieve team goals?
- What impact will the person have on team chemistry?

Even people who are not standing members of the team can influence it. Team members may bring representatives from different campus departments to meetings to advise on an ad hoc basis.

Team Chairperson

Team chairpersons are ordinarily from student affairs, judicial affairs, campus law enforcement, or counseling and mental health services. The chairperson's personal characteristics, rather than functional position, often dictate his or her success and compatibility with the chair position. In selecting a team chairperson, a college or university should look for someone with the following attributes:

- Understands and champions the team's purpose or goals. Problems may occur when team members feel more passionately about the team's purpose than the chair.
- Has time to chair team meetings and a commitment to making team activities a priority.
- Is respected by his or her peers and is well organized.

Team Structure

Student threat assessment teams can be structured in many different ways to best serve the institution's unique needs. An institution should determine the appropriate structure based on:

- **Institution size:** A larger institution may need to include more people on the team to achieve coverage across campus.
- **The existence of pre-existing assessment teams or committees:** If an institution already has a workplace violence team, it may want to expand the focus of this team to include students.
- **Other campus initiatives:** A team may include an oversight committee so that team data or experience can be used to support other campus initiatives, such as improving student mental health services.

Colleges and universities with established student threat assessment teams follow one of three general structures.

The following describes the three models:

Model 1—Threat Assessment Team with Violence Subteam

Under model 1, an institution has an independent threat assessment team that focuses broadly on student behavioral concerns. This team generally is not subject to oversight by or coordination with other campus teams. The team usually meets on a weekly or biweekly basis but in some instances once a month, adding sessions when needed.

At some institutions, the chairperson for the student threat assessment team may also preside over the workplace violence team that is focused on troubled faculty and staff. Institutions that have separate teams assessing behavioral concerns of employees and students often coordinate the two teams by having a common member, such as the team chairperson, or occasionally holding joint meetings. This coordination ensures that the teams use a consistent approach to case assessment, which is valuable when employee and student issues overlap.

A violence subteam has potential benefits provided members receive threat assessment training. Training of the entire subteam is necessary even when it includes a person or consultant with threat assessment expertise (see "Train the Team" on page 10). The subteam allows specialization so that issues of potential violence are handled by a smaller, more nimble group that understands how to investigate, assess, and manage individuals presenting a threat of violence to others.

The subteam can work particularly well when an institution has a strong campus police force. Here, a few members of the police force are trained in threat assessment investigations. These police officers gather background information on students whose behavior is reported. If results of the background investigation and team discussions indicate that the student poses a threat, the case would remain with the violence subteam. However, if the subteam's assessment indicates that the student does not pose a threat, the matter would be referred for handling by the threat assessment team.

Model 2—Threat Assessment Team with Oversight Committee

Model 2 is similar to model 1 in that it usually meets on a weekly or biweekly basis and may include a violence subgroup. However, model 2 also includes a multidisciplinary oversight committee to monitor the threat assessment team's actions.

The oversight committee meets less often than the threat assessment team, usually monthly, quarterly, or as needed. At some institutions, the oversight team can be much larger than the threat assessment team and can include representatives from many other campus departments. At others, the oversight team is smaller. Regardless of size, the oversight team typically includes representatives from the threat assessment team, such as the chairperson, certain select core team members, or, in some cases, all of the

core team members. The oversight team often includes individuals not on the core team, such as a representative from the president's office or municipal police department or other public service provider.

The oversight team can serve many purposes depending on the institution's needs. Often it does the following:

- Oversees the activities of, and provides input to, the core team.
- Handles general crisis response issues.
- Provides feedback on cases that present severe or complex risks. *For example, if a particular case presents a risk of harm that involves many campus constituencies, the threat of a lawsuit, or damage to the institution's public relations or reputation, the threat assessment team might seek guidance from the oversight committee.*
- Monitors the cases the threat assessment team handles and identifies trends in critical incidents, campus safety, and student issues. Based upon the trends identified, the oversight committee may recommend changes to institutional policy and procedures.
- Reviews the threat assessment team's procedures and recommends improvements concerning the team's actions or processes. Topics include:
  - Means used by campus constituencies for reporting to the core team
  - Education of campus constituencies about reporting
  - Responses to the reports received
  - Investigation and assessment of reported cases
  - Case management strategies
  - Team communication
  - Team documentation practices
  - Team composition and chemistry

Model 3—Threat Assessment Team with Multiple Supporting Committees

Under model 3, supporting committees exist to address discrete issues related to the matters handled by the threat assessment team. The chairperson of each of these supporting committees sits on the threat assessment team and reports on them. Threat assessment teams make these supporting committees responsible for particular issues that may require special focus or expertise, such as campus violence, alcohol abuse, relational violence, threatening behaviors, or mental health.

Train the Team

Team training is important to develop chemistry and expertise, whether the team is newly formed or well-established and regardless of its structure. Effective training can include the following:

- **Threat assessment training:** This specialized form of training was developed by the Secret Service and FBI. Neither mental health nor law enforcement professionals receive threat assessment training as part of their required professional curriculums.[5] So, simply having such professionals on an institution's team does not bring threat assessment expertise. It is important, then, that the entire team or its violence subgroup receive threat assessment specific training. Qualified individuals and firms offer this type of training, but it is important to vet the credentials of potential trainers and look for those with an established history and experience in conducting threat assessments.

  One of the first tasks a team should address shortly after its formation is to vet and select a threat assessment expert to provide training and consultation. Threat assessment training should occur before the team is required to conduct an assessment. When a team is in the midst of determining whether

5 Mental health professionals are not adequately trained in predicting or preventing violent behavior, according to the book Rethinking Risk Assessment: The MacArthur Study of Mental Disorder and Violence, by psychologist John Monahan. Moreover, mental health professionals are only accurate in their predictions of whether an individual will act violently about 30 percent of time.

a threat exists, time is of the essence. Avoid wasting any critical time by establishing a relationship with a threat assessment expert before assessing reports.

- **Table-top exercises:** Practice exercises are effective for newly formed teams and those working on improving their assessment process. Walk through different hypothetical scenarios involving distressed students. For example, give every team member an envelope that contains different pieces of information about a hypothetical student. Then, have team members work through the scenarios by discussing:
  - What information is known and what information needs to be gathered?
  - What is each team member's role and how is information communicated to the team as a whole?
  - What are potential options for responding to the situation?
  - What campus departments are most appropriate to facilitate the response?
- **Legal training:** Tap in-house or outside counsel to train the team on information-sharing laws, documentation practices, disability laws, and other legal issues related to a threat assessment team's practices. To promote familiarity with the laws, conduct this training at least annually. Also, ask counsel to prepare a summary of all the laws covered so that team members have a quick reference when necessary.
- **Lessons learned:** On a quarterly or even a monthly basis, teams should review the cases handled to identify areas for improvement and successful practices. Oversight teams, if available, may perform the review, but the lessons learned should still be imparted to the core team.
- **Educational webinars, conferences, or other programs:** Attendance at these types of education programs can help the team to bond, foster dialogue on important issues, and broaden members' consciousness and knowledge base. Many organizations sponsor programs addressing a wide range of student-related issues. Organizations that have sponsored programming on threat assessment and other student issues include:
  - The Association of Threat Assessment Professionals (ATAP) has national and regional conferences with education programs on a variety of threat assessment issues.
  - The Association of Student Conduct Administration (ASCA) provides national and regional programs on a variety of issues confronted by student conduct offices.
  - Stetson University's National Conference on Law and Higher Education is an annual program addressing a wide variety of campus legal issues.
  - Legal Issues in Higher Education at the University of Vermont is an annual conference covering relevant legal and student affairs issues in higher education.
  - United Educators (UE) has previously produced telephone roundtables and other resources on threat assessment and campus violence. Visit UE's website to access these resources.

For more suggestions, ask team members about the professional organizations to which they belong and the types of continuing education programs they have attended or would recommend.

Reporting Student Behavioral Concerns

Teams often learn about a troubled student only after it is too late. Four out of five young adults who attempt suicide have given clear warnings, according to the Jed Foundation. The SSI found that 93 percent of school shooters exhibited troubling behavior prior to the attack. Moreover, in 81 percent of the school shootings studied, at least one other person had some knowledge of the attacker's plan. These statistics indicate that many students who harm themselves or others exhibited behavior that generated concern before the event. If their earlier troubling behavior is reported to the threat assessment team, these harmful events may be averted.

To ensure that critical information is reported on a timely basis, the team needs to take the following steps:

1. Identify potential reporting sources.
2. Educate potential reporters.
3. Create practical reporting options.
4. Audit the effectiveness of education and reporting methods.

Identify Potential Reporting Sources

People who have regular contact with students are obvious sources for reporting behavioral concerns. Fellow students, faculty and staff, threat assessment team members, and family members are among the most likely sources. Other people who may have only casual contact with a student can provide useful information, too. They include:

- **Online acquaintances and others** who may only know the student through social networking sites, blogs, message boards, chat rooms, video-sharing sites, and the like but still may spot troubling behavior.[1]
- **Community members,** such as local merchants and neighbors, who live and work in the institution's community may witness behavior that they find worrisome.
- **Local service providers,** such as personnel from hospitals, police, and state mental health facilities, can notify the institution if a student is arrested, hospitalized locally, or ordered by a local court to undergo a psychological evaluation.

1 An April 16, 2008, article from CNN.com chronicles the suicide of Virginia Tech student Daniel Kim. According to the article "Dad: Virginia Tech Treated Suicidal Son Like 'Joke.'", online acquaintances of Kim's emailed Virginia Tech's health center to notify the staff that they thought Kim was suicidal because of the content of his online communications.

Educate Potential Reporters

A 2008 report by the Secret Service and the Department of Education found that school climate affected whether bystanders came forward with information about threats. The report, *Prior Knowledge of Potential School-Based Violence: Information Students Learn May Prevent a Targeted Attack,* found that bystanders were more likely to volunteer information if they thought the school would take it seriously and address the situation appropriately.

For institutions to foster an environment in which individuals understand that certain information is valuable and should be shared, the threat assessment team must educate potential reporters about the team's existence, its purpose, and the types of behaviors that should be reported.

The Team and Its Purpose

Many institutions are hesitant to tell people about their student threat assessment teams, preferring instead to operate in secret. However, secrecy is not in the best interest of the institution.

Some states have already passed laws requiring institutions to create threat assessment teams, and others are in the process of doing so. Campus constituencies are more likely to take comfort from knowing there is a team than feel anxious about it. When teams operate in secret, constituents' suspicions are automatically raised. They question the need for shadows and perceive impropriety even when there is nothing to hide. When people understand that there is an established mechanism for responding to such reports, institutions have a better chance of creating a climate in which people feel comfortable reporting information and concerns.

People are often reluctant to report information because they fear they will get someone in trouble or stigmatize a person. An institution has to assuage those fears. In any descriptive communications, the institution should emphasize the team's proactive function of coordinating resources for students in need and emphasize that it is not a disciplinary body. Even the team's name can emphasize these helpful aspects of the team (see "Team Name" on page 5). When describing the team, consider the following sample language:

> **Student Concerns Team**
>
> The Student Concerns Team consists of a multidisciplinary group of administrators, staff, and faculty who support and coordinate services for students whose observed behavior has caused concern.
>
> You may contact any of the team members listed below to report your concerns about a student. The information will be shared with the team to determine appropriate action, which may include contacting or convening other members of the community as needed and on a case-by-case basis.

The Information to Report

Keep the following points in mind when communicating the type of information reporters should submit:

- Reporting thresholds should be low.
- Descriptions of what to report should be brief and simple.
- Situations or behaviors that present an immediate threat of harm should be directed to police and not the team.

Many institutions have created detailed guides about the warning signs of distressed students. These guides contain long lists that elaborately describe potential signs displayed by a student in distress. Some delineate the number of times certain behaviors must be observed before they can be reported, while others differentiate between levels or states of distress and describe a series of action steps for concerned individuals to take at each level. Such a detailed document may easily overwhelm or intimidate potential reporters, or it may simply deter people from reading the guide. Others may not come forward for fear that their concerns do not match one of

the guide's warning signs or because they did not attempt one of the guide's recommended action steps.

It is far more helpful to keep your guidance simple and brief and preface it in such a way to encourage reporting of any and all troubling behavior. Take a cue from the simple slogan developed by the New York Transportation Authority to promote reporting of suspicious activities—"If you see something, say something." When describing what to report whether on a website, in an email, online, or face to face, consider the example on the following page.

Different Education Methods

Institutions use a variety of methods to educate and train potential reporters, such as websites, online training, live workshops and presentations, and emails.

- **Live workshops or presentations:** An institution's size will determine how many reporters it can reach through an in-person presentation or workshop. Campus administrators maintain that these in-person programs are the most effective way to educate on-campus groups. Typically, the chairperson of the threat assessment team, another team member, or an outside consultant leads the presentation. Below is a list of campus constituencies to consider training through this method. Large constituencies, such as staff and faculty, can be better managed if they are segmented for training (by department, for example):
  - Administrators
  - Staff
  - Faculty
  - Resident advisors
  - Student groups (athletics, Greek life, and other organizations)
  - Parents
  - Members of the local community or town
- **Webpage:** The institution's website is the one vehicle that has the ability to reach *all* potential reporters, including "concerned others" who may only know a student from online contact. For this reason, the threat assessment team should work with the information technology (IT) department to create webpages that are easily accessible.
- **Online training programs:** Online training is a convenient and economical way to educate on-campus reporters and is one of the best ways to reach faculty and adjunct faculty.
- **Emails to faculty, staff, students, and parents:** Institutions may consider sending annual or bi-annual email updates to faculty, staff, students, or parents to educate them about the team and reporting options.
- **Articles in the student or local newspaper:** Students are likely to read articles about the team and its purpose in the student newspaper.
- **Public service announcements on the student radio or television station:** A series of short public service announcements that briefly outline what and how to report can garner a lot of attention.
- **Pamphlets or posters:** Many institutions create short pamphlets or posters about the team and post them in places of visibility, such as student residence halls, public restroom stalls, and a student union.

Create Practical Reporting Options

To reach the broadest audience of potential reporters, institutions should offer many reporting options. By including several departments on the team, institutions can tap into pre-existing communication channels and the information shared within those departments. When only a few reporting methods are offered—such as a single email address or phone number—the institution limits the audience of potential reporters to those that prefer those methods. Should those methods fail to function properly, the information may never reach the team.

EXAMPLE: Communications Encouraging Reporting

Student Concerns Team Seeks Your Help

Student Behavior Involving an Immediate Threat

If you believe a student is in need of medical treatment or poses an immediate threat to himself or herself or to others, **call 911 or campus police at 555-1234**. Some examples of situations where police should be contacted immediately:

- A student has access to weapons and is threatening to use them.
- A student is attempting suicide.
- A student otherwise indicates he or she intends to do harm to self or others.

Student Behavior of Concern

If you do not believe the student is an imminent threat, you still can report a student's behavior that is:

- Extremely unusual
- Troubling or concerning
- Disruptive to your environment (classroom, office, or other)
- Causing discomfort to you or others
- Potentially threatening in any way

Please contact the Student Concerns Team, which consists of a multidisciplinary group of administrators, staff, and faculty who support and coordinate services for students whose behavior has caused concern.

Remember—If your instinct or gut feeling tells you something is wrong, trust it. Don't wait for tangible "proof" that a problem exists. Promptly report your concerns to the Student Concerns Team.

Another issue to consider is the potential drawback of encouraging reporters to submit information to the counseling center. While a recommendation for counseling may be an intervention strategy that arises out of a threat assessment team's investigation, counseling may not be the best department to receive reports. Confidentiality of client information is an important component in the success of the counseling process. If the counseling center forwards reported information to the threat assessment team, the perception of patient confidentiality may be damaged. Moreover, not all troubling behavior is indicative of a mental health problem. Yet, if reports of student behavioral concerns are directed to the counseling center, all reported behavior issues may be viewed through a mental health lens. Lastly, given the importance of client confidentiality, counseling center personnel are often conservative about sharing information (even when there are no legal or ethical prohibitions). Many mental health professionals may simply decline to share any information reported to them for the threat assessment team to evaluate.

Consider the following options to encourage reporting:

- **Appoint a threat assessment team member to be a liaison with every campus department:** Student threat assessment teams at many campuses enhance reporting by appointing individual team members as a liaison to every department at the institution. A liaison chart that lists different campus departments, the contact person for the department, and the corresponding threat assessment team liaison can document this arrangement (see Appendix B for a sample liaison chart). Once established, the

departmental contact and the team liaison can serve as a conduit for department reports to the threat assessment team.

- **Reach out to campus departments (not represented on the threat assessment team):** Team-member liaisons should reach out to the following campus departments to obtain information about students who are displaying troubling behavior. For example:
  - *Maintenance or dining services*—Employees providing support services such as janitors, maintenance, and food service workers are often an important source of student information. Students may engage in behavior in front of support staff without knowing or caring because they see the staff as "invisible." Moreover, students may confide in support staff since they are not in a position of authority.
  - *Graduate and professional schools*—The rigors of graduate and professional programs can prompt behavioral issues in these students.
  - *Offices devoted to special student populations (first-year students, international students, disability services)*—Offices serving special populations may have pertinent information since the students belonging to special populations are often under greater stress and may display behavioral issues.
  - *Honor boards*—Some institutions have honor codes and a process for their enforcement. Students who violate these codes should be reported to the team.
  - *Student groups, including fraternities and sororities, clubs and athletics*—Given the frequent interactions of group members, coaches, trainers and even fans, these groups can be an important source of student information.
- **Reach out to local hospitals, other mental health facilities, and the police department:** Appointed team members should conduct outreach with local service providers on a regular basis. For example, the head of student medicine can develop a relationship with people in the emergency room of the local hospital, while the institution's counseling staff develops a liaison with the hospital's psychiatric staff. Campus police can do the same with the local or municipal police department.
- **Offer numerous methods for reporting information to the team:** A variety of reporting options makes it easy for people to communicate with the team. These methods can include a special threat assessment team email address as well as choices for telephone and text communications so that people can notify the team as a whole rather than just individual members.
- **Offer an anonymous reporting option:** An anonymous reporting option can encourage people to come forward who might not otherwise because they feel uncomfortable relating certain information or fear for their own safety.

Assess the Effectiveness of Education and Reporting Methods

Institutions should annually audit the threat assessment team's efforts to identify and educate potential reporters and the reporting methods made available to potential reporters. Many factors affect whether critical information reaches the team, such as turnover of potential reporters (as a result of student graduations, staff and faculty job changes), cumbersome reporting methods and failure to train reporters adequately. A regular audit can help the team spot and correct any issues that deter reporting.

Consider the following three-step process to assess the effectiveness of a team's education and reporting methods.

Step 1: Create a Record

Use a form to document education and reporting methods like the "Education and Reporting Methods Audit" form, shown on page 18. (Also see a blank form in Appendix C on page 37.) This document makes it easy to keep track of all potential reporting sources (in

column 1), the methods for educating them about the team and reporting (column 2), the frequency of training (column 3), and the reporting methods the team makes available to reporters (column 4). By keeping the form up-to-date, team members will have the facts they need at hand when they evaluate their methodology during annual audits.

Step 2: Examine Reports Received

Once a year, the threat assessment team or its oversight committee should review the reports received by the team during the past 12 months.

The team should answer the following:

- How many reports did the team receive?
- Who submitted reports?
- How many reports did each source submit?
- Did the team receive reports from all potential reporters?
- Were any potential reporting sources underrepresented?
- Do the quantity and source of the reports match expectations?

The review should also focus on individuals who had reportable information but did not report it. Interview them to understand why they did not submit that information to the team.

This information is required to evaluate fully the team's efforts at educating and training potential reporters and offering practical reporting methods. The team should record the results of this review in column 5 of the audit form.

Step 3: Evaluate Education and Reporting Methods

Once the team or oversight committee has completed a review of the reports received by the team over the prior year, it can use the audit form to assess the effectiveness of current training and reporting methods. To complete the form, the team should consider doing the following:

- Review the education methods used for different groups of potential reporters (columns 2 and 3).
  - Do all potential reporting sources receive some education or training?
  - What type of training is provided?
  - How often do they receive education or training?
- Review all reporting methods offered to each group of potential reporters (column 4).
  - What reporting method is each group informed about?
  - What reporting method did it use?
  - Are the groups that report less offered different types of reporting methods?
- Review the problems with or barriers to education or reporting methods that were identified during step 2 (column 5).
- Is it possible to remove or overcome any barriers or deterrents to reporting through an improvement or change to the team's efforts? If yes, identify the specific improvement or change that the team can implement (column 6).

The example on the following page illustrates how to complete the audit form as it concerns "parents" as a potential reporting source.

After completing the audit form, the team or its oversight committee should understand which education and reporting efforts do not work and identify ways to improve the effectiveness of its education and reporting methods.

EXAMPLE: Form to Document Education and Reporting Methods

Education and Reporting Methods Audit					
(1) Potential reporter	**(2) Education methods**	**(3) Frequency of education**	**(4) Reporting methods**	**(5) Problem(s) identified during annual review of reports**	**(6) Improvements to education and reporting methods**
Parents	Presentation given at first-year orientation. Parents provided a list of potential warning signs.	Annually.	Team members' email and phone number and an anonymous reporting phone number.	Very few reports submitted by parents; the few reports received came from first-year student parent group; reports made by telephone.	Expand scope beyond parents of first-year students by giving a presentation at Parents Weekend in the fall.
	Website. Simple description of troubling behaviors listed.	Continuously available through the web.	Anonymous email address and phone number.		Parents want to report to an actual person. Team will provide contact information for one member as the parent liaison.
	Informational pamphlet sent to parents of first-year students. Description of behaviors from website used.	Annually.	Contact information for all team members.		Will mail this pamphlet to all parents and not just parents of first-year students.

Assessing and Intervening with Students of Concern

Once a report about a distressed student is received, threat assessment experts recommend that teams follow a four-phase threat assessment process to evaluate the information and to determine an appropriate intervention strategy.[1] *A standard process makes it more likely that teams will act consistently and not let arbitrary or immaterial factors influence them. The four phases of a threat assessment process generally proceed as follows:*

1. Initial screening

2. Pre-inquiry

3. Full Inquiry

4. Intervention

A threat assessment is a fact-based process, so a team may not address every phase or proceed through the phases in the same sequence. For example, if a team learns a student has threatened suicide, its first action would be to notify emergency personnel. Given the immediate risk of harm, the team would skip the pre-inquiry phase and move directly to a full and detailed inquiry. More ambiguous information—that a student is missing classes and appears depressed, for example—would call for a different approach. A pre-inquiry would be helpful to decide whether a full inquiry or an intervention is necessary. This framework provides teams with the flexibility they need in responding to the various possible threats.

Before adopting an assessment process, institutions should consult their legal counsel to make sure they can execute the process without violating their own policies and procedures, disability laws, student privacy laws, defamation laws, or any other laws relevant to the threat assessment process.

1 Advocates of this four-phase threat assessment process include Marisa Randazzo, president of Threat Assessment Resources International, and Gene Deisinger, deputy chief of police and director of Threat Management Services for Virginia Tech University.

Initial Screening—Determine Whether an Emergency Exists

When a team receives a report of concern, its first question should be, "Is there an *immediate* danger or an emergency situation?" If the answer is "yes," the team should immediately contact campus or local law enforcement.

A team's ability to answer the question accurately requires an understanding of what constitutes an emergency or an immediate danger. Campus or local law enforcement professionals and administrators can provide team members with the training they need to understand emergency situations. These groups have experience and expertise in recognizing situations that need an urgent response.

There is no room for error when a call comes in. Team members will have to decide on the basis of the information in the initial report and any knowledge they already have about the student. When danger is believed imminent, there is little time for additional information gathering.

If the matter is referred to law enforcement, a team should proceed with a full inquiry and possibly notify its crisis response team. A full inquiry is necessary so that the team can prepare for the student's possible return to campus after the emergency has passed.

If the team is unable to determine whether an imminent threat exists, it should move to the pre-inquiry phase. However, members should be alert to changes. **If at any phase of the assessment process, the situation appears to be an emergency, team members should first contact law enforcement and then continue their assessment.**

Pre-Inquiry—Decide the Need for Further Inquiry

If the team determines no immediate danger exists, it should ask itself, "Is a full inquiry necessary?" That answer requires two steps aimed at (1) gathering additional information and (2) addressing triage questions.

Step 1: Gather Additional Information

The team should consider the following sources to supply a range of information that will present a fuller picture of the student:

- **Threat assessment team records** to see if the student previously has been the subject of a report reviewed by the team.

- **Student affairs** to see if there have been any incidents involving the student.
- **Campus police or security** to check for past contacts with the student.
- **Local law enforcement** (even when an institution has its own campus law enforcement department) to see if the local authorities have had any contact with the student.
- **Judicial affairs** to check for prior contacts, patterns of problems, or escalation of rule-breaking behavior.
- **Academic affairs** for classroom and other incidents involving the student.
- **Residence life or housing staff** for residence hall incidents involving the student or observable behavioral changes, such as deterioration in personal hygiene.
- **Online resources** by searching the person's name, the name of the institution, and the names of anyone he or she may have threatened, harassed, pursued, or scared. Recommended websites to search include:
  - Google
  - MySpace
  - Facebook
  - YouTube

- Cuil
- Technorati.com (searches blogs)
- Twitter
- Blackplanet
- MiGente
- Bebo
- Xanga
- Snopes
- Craigslist (search the relevant city or town)
- Thehoodup

Step 2: Answer Triage Questions

The team should use the information gathered during step 1 of the pre-inquiry to answer the following questions:

- Has the student mentioned any violent thoughts or plans including thoughts or plans of suicide?
- Have there been any behaviors that cause concern for the person's well-being, such as behaviors that are significantly disruptive to the campus environment?
- Does the student own weapons, or is he or she attempting to acquire weapons?

If the answer to any of these questions is "yes," a full inquiry is recommended. This is also is recommended if there is not enough information to reasonably answer these questions. A full inquiry would not be necessary if the answers to all the questions are "no." However, if the team learned about problems in the student's life through its pre-inquiry information gathering (for example, a pattern of alcohol or substance abuse problems), the team should then consider appropriate intervention strategies to address these issues (see "Intervention— Manage the Threat or Provide Assistance" on page 25). It is helpful to document both the incident that brought the student to the team's attention and the results of the pre-inquiry in case the student comes to the team's attention again at a later date (see "Document Information" on page 27).

Full Inquiry—Determine if the Student Poses a Threat or Needs an Intervention

In a full inquiry, the team will develop a more complete understanding of a student by gathering additional information, assessing it, and determining whether he or she poses a threat of violence or is otherwise in need of intervention assistance.

Step 1: Gather Information

If the threat assessment team has not conducted a pre-inquiry, at this stage it should first gather information from the preliminary sources discussed above. If the pre-inquiry is completed, the team can build on that information and deepen its understanding of the student's circumstances by contacting potential reporting sources. These information sources include:

- Fellow students that interact with the troubled student such as:
  - Classmates, roommates, and friends
  - Members of Greek organizations or student groups to which the student belongs
  - Teammates on varsity, club, or intramural athletic teams on which the student participates
- Faculty
- Staff such as:
  - University legal counsel or risk manager (if not on the team)
  - Honor boards
  - Janitors, maintenance, or food service workers
- Parents, legal guardians, or close relatives
- Concerned online acquaintances and others
- Community members, such as local merchants and neighbors
- Local service providers, such as personnel from hospitals, police, and state mental health facilities

Other valuable sources of information concerning the student can include:

- **Prior schools that the student has attended.** The team may request information from prior educational institutions, which may have information about problems that the student had in their settings.
- **Email or Internet information.** Depending upon the institution's policies, the threat assessment team may be able to access the student's email account and any Internet search histories the student conducted. The team's investigations may reveal that the student is at some stage of considering committing violence or suicide or both.

Team members do not have to ask these sources complicated questions. Rather, a team member can simply ask, "Have you noticed, heard, or been told anything about [student's name] that seems out of the ordinary or concerning?" The team should be prepared to help people overcome any reluctance they may feel about providing information; people sometimes fear they will be perceived as overreacting or sounding an alarm. Encourage people to share any and every observation, even those they think may be nothing.

Step 2: Assess Information About the Student

The Secret Service and the Department of Education developed 11 questions that provide a framework for analyzing the information that threat assessment teams gather. Guidance on understanding the responses is available in the agencies' publication *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates.*

The following assessment questions have been adapted from the agencies' guide to better fit the higher education environment.

1. **What are the student's motives and goals?**
   In answering this question, the team is looking to understand what motivated the student to make the statements or take the actions that brought him or her to the team's attention and whether these circumstances still exist. Does the student have a major grudge or grievance that motivated his or her troubling behavior? If so, the team should determine against whom or why the student feels this grudge and how the student would like the issue resolved. This information can be helpful in crafting an intervention strategy.

2. **Have there been any communications that suggest the student is intending to harm himself or herself or others or has ideas about doing so?**

   Examine the student's communications to friends, potential targets, co-workers, faculty, family, and others. Also, examine the student's written communications through websites, blogs, emails, or journals. Any talk about doing harm is a strong indicator that the student may be on a pathway toward violence.

3. **Has there been any behavior that suggests the student has ideas about harming himself or herself or others?**

   Concerning behaviors might include:
   - Developing an idea or plan to harm himself or herself or others
   - Making efforts to acquire or practice with weapons or other material to support a violent attack
   - Observing possible locations for a violent attack
   - Stalking or monitoring potential targets
   - Gaining access to potential targets
   - Rehearsing attacks or ambushes

   Evidence that a student has engaged in attack-related behaviors indicates that the student is on a pathway toward violence and is taking steps toward carrying out an idea to do harm. This is a serious sign of the potential for violence. As such, a team should seek to corroborate the reliability of reporting sources who say a student is engaged in attack-related behaviors.

4. **Does the student have access to weapons or the means to carry out an act?**

   Seek to find out whether the student has access to weapons and ammunition for carrying out an act of harm. Although possession of a weapon does not mean a person is on a pathway to violence, ownership together with evidence of a student's idea to do harm should raise the team's concern.

5. **Has the student shown inappropriate interest in any of the following:**

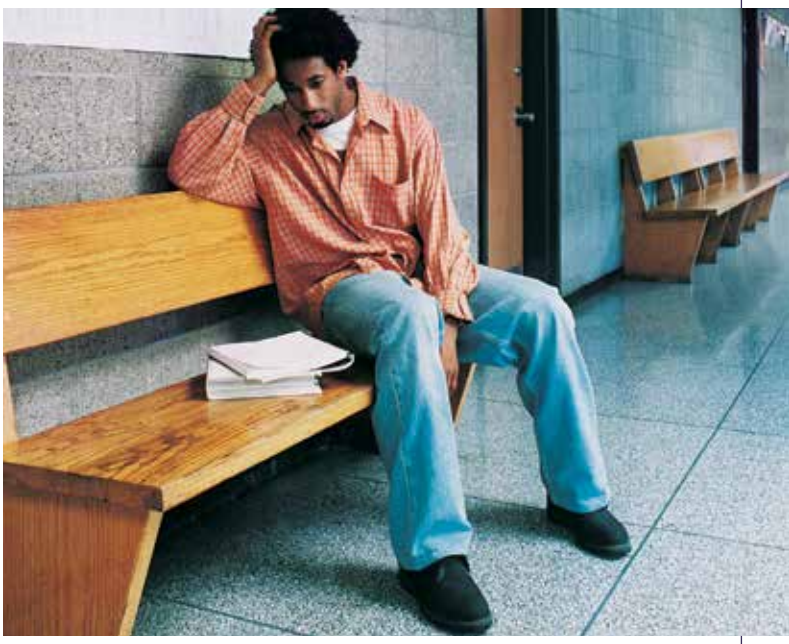
   - Workplace, school, or campus violence
   - Weapons (including recent acquisition of a weapon)
   - Incidents of mass violence such as terrorism, workplace violence, and mass murderers
   - Obsessive pursuit, stalking, or monitoring of others

   A "yes" response to this question does not necessarily mean the student poses a threat or is otherwise in need of help. However, if the person shows inappropriate interest in these topics and raises concerns in another way, such as communicating an idea to harm, expressing despair, or purchasing a weapon, the team should be concerned because of the combination of these facts.

6. **Is the student experiencing hopelessness, desperation, or despair?**

   Identify if the student has experienced a recent failure, stressful event, loss, or loss of status. If so, the team should examine how the student is coping with it. For example, has the student been using drugs or alcohol more frequently? Is the student often absent from class? Has the student's personal hygiene declined? Does the student talk about suicide? These are signs that the student may be experiencing hopelessness, desperation, or despair.

   Many persons who have engaged in violence have been suicidal prior to or at the time of their attacks. While most people who feel hopeless or suicidal will not pose



   a threat of harm, they are still in need of help. If there is no information indicating an idea to do harm, but the team determines that the student is experiencing, or has recently experienced, desperation or thoughts of suicide, or both, the team should develop a plan to refer the student for mental health care. But if the team determines that the student is experiencing hopelessness and there is information indicating an idea to do harm, the team should devise a plan to intervene.

7. **Does the student have a trusting relationship with at least one responsible person (such as a friend, significant other, roommate, colleague, faculty advisor, coach, or parent)?**

   Determine whether the student is emotionally connected to other people. Check to see if there is at least one person in whom the student confides. If so, this is positive so long as the confidant does not promote using violence or self-destructive methods to solve problems. If the confidant shares an interest in violence or self-destructive behavior, this can increase the likelihood that the student will engage in an act of harm. If the confidant does not, the team may solicit the person's help in developing an intervention plan.

8. Does the student see violence as desirable or the only way to solve problems?

Examine whether the student's friends, co-workers, parents, or colleagues explicitly or implicitly support or endorse violence as a way of resolving problems or disputes. For example, has the student been dared by others to engage in an act of violence? Try to ascertain whether the student identifies with perpetrators of violence or glorifies acts of violence. A student who does is more likely to perceive violence as a desirable way to solve problems.

If the student sees violence as a potential, reasonable, or desirable solution to his or her problems, the team should be concerned. It should consider its options for helping the student solve the problem or improve the situation so that violence no longer appears to be a viable solution.

9. Is the student's conversation or "story" consistent with his or her actions?

Depending on the circumstances, the team may decide to interview the student who is the subject of the threat assessment inquiry. The team can use the interview as an opportunity to determine how forthcoming the student is. For example, determine whether the student's version of the situation confirms or disputes the information from collateral interviews. If what the student says he or she is doing conflicts with what others report, the student may be lying.

Often a direct talk with the student can act as a deterrent because it gives the student a chance to tell his or her side of the story. This opportunity to be heard can reduce the student's anger and hostility and create a rapport. The rapport can be helpful if an intervention is necessary. However, the less forthcoming the student is, the more work the team will have to develop a rapport if an intervention is necessary.

10. Are other people concerned about the student's potential for violence?

Through interviews, the team should try to ascertain whether others are concerned that the student may commit an act of harm. Since people are often reluctant to see violence as a possibility, if a person believes the student is capable of violence, this should raise the team's concern. However, the team should also recognize that those in close relationships with the student, such as a parent or significant other, may be too close to the person to see violence as a possibility. The likelihood of such a bias should be taken into account when considering the opinions of those close to the student.

11. What circumstances might affect the likelihood of violence?

If possible, the team should try to identify any factors in the student's life or environment that might increase or decrease the likelihood that he or she will engage in acts of harm. By asking this question, the team can better tailor its intervention strategy. For example, if things look like the student's situation might deteriorate, the team can try to develop an intervention plan to counteract the downturn in circumstances. However, if conditions look like they might improve, the team could monitor the student and reassess the situation later.

Step 3: Determine Whether the Student Poses a Threat

Use the analysis of the 11 assessment questions to answer the ultimate threat assessment questions about the student:

1. **Does he or she pose a threat of harm to self or others?**
   Team members should review their responses to the assessment questions and answer:
   1. Has the student developed an idea to do harm?
   2. Has the student developed a plan to carry out the idea to do harm?
   3. Has the student taken any steps toward implementing the plan?

Based on these considerations, the team can select the option below that best applies. This assumes it has gathered sufficient information to answer each question with a "yes" or "no." An inquiry is not complete until a team has gathered enough information to reasonably answer these three questions.

- **Option 1 — "Yes" to two or more questions**
  If the answer to two or more questions is "yes," the team can conclude that the student may pose a threat of harm to himself or herself or others. The team should try to identify how quickly the student is moving toward engaging in harm. If the threat looks imminent, law enforcement should be called, and there should be coordination with the institution's crisis response team. If the threat does not appear imminent, the team should select an intervention strategy (see "Intervention— Manage the Threat or Providing Assistance" on this page) to move the person off the pathway toward violence.

- **Option 2 — "Yes" to one question**
  If there is a "yes" answer to only one of the questions, the student may not pose a threat at this time. The potential for violence is dynamic, however, and the student could pose a threat later. Therefore, the team should review its responses to the 11 assessment questions and attempt to identify circumstances that might increase the student's likelihood for violence. The identified circumstances should be factored into the team's selection of a prudent intervention strategy. A "yes" answer to any of the three questions is cause for concern and should be addressed through an intervention.

- **Option 3 — "No" to all three questions**
  If the answer to the three questions is "no," the team can proceed to the next question.

2. **If he or she does not pose a threat of harm, would the student otherwise benefit from assistance or an intervention?**

   If the inquiry reveals that the student is in need of help or has a potential behavioral issue—such as feelings of hopelessness, a potential alcohol problem, or a possible mental illness—the team should proceed to phase four of the threat assessment process and select an appropriate intervention strategy.

   However, if no potential problems are highlighted, the team should close the inquiry. Regardless of the manner in which an inquiry is concluded, it is advisable to document the results and the incident that brought the student to the team's attention (see "Document Information" on page 27).

Intervention—Manage the Threat or Provide Assistance

Effective intervention by the threat assessment team is a three-step process that includes identifying the goals of the intervention, selecting an intervention strategy, and monitoring its effectiveness.

Step 1: Identify the Goals

The goals of an intervention will differ depending on the student's situation. For example, the intervention or assistance provided to a student who poses a threat of

violence will differ from the help provided to one who is struggling due to a drug or alcohol problem.

- **The student who poses a threat:** If the team determines that the student poses a threat of violence (or suicide), the team should identify a plan to intervene and reduce that threat. If the threat appears imminent, however, the team should immediately contact law enforcement to contain the situation.
- **The student who otherwise needs assistance:** If a student has exhibited behavior that indicates a need for other assistance or resources, the team should identify the troubling behavior and select an appropriate intervention.

Step 2: Select a Strategy

To select an appropriate intervention strategy, team members should consider these factors:

- **Information gathered during the inquiry** that identifies the cause of the student's behavior problems
- **The legal impact of the potential intervention** by consulting legal counsel to ensure that the intervention does not violate the institution's policies and procedures, disability laws, privacy laws, or other legal considerations
- **The opinions of those most experienced** in successfully resolving the type of student issue presented
- **The opinions of those most familiar with the student** regarding the actions they believe are most likely to help
- **The feasibility of the intervention strategy,** which should not be unduly burdensome for departments or staff members to implement from either a practical or legal perspective
- **The effectiveness of the intervention strategy to reasonably address existing campus safety issues,** such as the safety of any victims or potential victims

Although it is helpful to get recommendations on strategies from many team members, a democratic voting process is not always advisable. Teams will need to make decisions quickly, and time will not permit them to worry about whether a quorum of members is available.

The following is a list of common intervention options to consider in crafting an individualized threat management plan or in providing the student with assistance:

- Talk to the student.
- Identify an ally or trusted person in the student's life who can talk to the student.
- Notify parents, other family members, or guardians.
- Involve law enforcement.
- Permit student leaves.
- Remove from housing.
- Mandate a psychological assessment.
- Monitor involuntary hospitalizations.
- Modify campus procedures.
- Act to protect the victim.
- A more detailed description appears in Appendix D on page 38.

Step 3: Continue Monitoring

The threat assessment team will continue to monitor a situation involving a troubled student until there is no longer a reasonable threat posed by the student or until the student's troubling behavior is effectively managed. This may occur well beyond the closing of a criminal case or the completion of mental health services. To determine whether the intervention strategy has met its goal, the team should monitor the intervention's effectiveness. If after monitoring an intervention, a team determines it is not working, the team should select a different strategy.

Sharing and Documenting Information

The law and campus personnel's understanding of it can greatly affect the extent to which threat assessment teams share, gather, and record information. In its analysis of the shootings at Virginia Tech, the Virginia Tech Review Panel determined that insufficient understanding of information-sharing laws contributed to the circumstances that led to the shooting. Federal and state laws allow and support sharing and documenting student information for team purposes.

Share Information

The laws that most likely influence the sharing of student information for team purposes include:

- State tort law affecting negligence standards
- The Family Educational Rights and Privacy Act (FERPA)
- State and federal medical confidentiality laws

State privacy laws also affect information sharing. However, the laws vary greatly, and so they are not described here. Also absent from this discussion is the Health Insurance Portability and Accountability Act (HIPAA) because HIPAA's privacy rules do not apply to campus-created student treatment records.

A decision to share student information is separate from the issue of whether the disclosure is legally permissible. Fortunately, a student's best interests and the law are rarely at odds. When trying to decide about disclosing information that concerns a struggling student, institutions should be guided primarily by the student's best interests and less by the law. In the majority of circumstances, the law supports sharing student information when there is a reasonable belief that disclosure will help the student.

Institutions should consult with their general counsel for advice on the requirements of relevant federal and state laws. Threat assessment teams should also consult with in-house or outside counsel for training on information sharing so that they understand the circumstances in which information can and should be shared.

State Tort Law

While state tort law does not directly regulate communications about students, a negligence legal action by the student or his or her family often will focus on the extent to which an institution shared student information with those who could have provided help. Some campus representatives mistakenly believe their institutions would be vulnerable to a lawsuit if they share information about concerning student behavior. The contrary is often true. Institutions may minimize their liability exposure by sharing information about troubling student behavior in order to better coordinate a response. Generally, negligence standards require an institution to respond reasonably to a notice of risk. If an employee of an institution has notice about a student's troubling behavior, that notice in most situations is attributable to the institution.

Notice of a risk gives rise to a duty of care. Once a college or university employee knows about a situation involving a troubled student, the institution likely has a duty to reasonably respond to those risks even if the employee never tells anyone or takes any action. An institution that has a threat assessment team that receives and responds to reports of troubling student behavior is more likely to meet its duty of care and respond reasonably than one that does not. That ability to respond may also help the institution reduce the likelihood of a negligence claim.

Family Educational Rights and Privacy Act (FERPA)

FERPA governs the privacy of student "education records" at all institutions receiving federal funds. An education record is broadly defined to include any records (even those of a nonacademic nature) directly related to a student and maintained by an institution. The law requires representatives of an institution to receive written consent from a student before disclosing that student's education records to others. FERPA also gives students the right to access their education records. Yet, FERPA is not as onerous as it may sound. **The law applies only to records and provides many exceptions allowing disclosure without a student's consent.**

- **Applies only to records:** While commonly understood to protect student privacy, FERPA actually is more narrowly focused and protects only the privacy of student *records*. The law does not apply to information that is not in record form. Because of their relevance to the threat assessment team's work, some categories of information that FERPA does not consider an education record are important to understand, such as:
  - **Personal observations:** A professor, staff member, or other representative of an institution is free to share his or her own personal observations of students with others, including the team or a parent. Observations are subject to FERPA only if they are reduced to a record with the intention of sharing the record information with others. While the recorded form of the employee's observations is subject to FERPA, the law would permit the employee to disclose his or her observations and personal interactions to anyone.
  - **Law enforcement records:** Records created by campus security personnel for law enforcement purposes are not education records. FERPA does not restrict campus law enforcement personnel from sharing the records they create or their content with people outside of their department. If shared, however, the character of the records can change for the campus staff member who comes to possess them. For example, if law enforcement personnel relay recorded information about a student to a member of the threat assessment team,

the record in that team member's hands would be subject to FERPA. In the possession of the law enforcement officer, that same record would not be subject to FERPA and could be shared by law enforcement without restriction.

- **Provides exceptions allowing disclosure without a student's consent:** FERPA specifies 15 circumstances under which it permits institutions to disclose education records *without* a student's written consent. Also, under FERPA, an institution's representative is never required to disclose student information; rather by permitting a disclosure, the law allows the representative to decide whether or not to disclose student record information. When making the decision, the representative's primary consideration should be the student's best interests.

Following are several disclosures permitted under FERPA that a threat assessment team should know about:

- **Legitimate educational interest:** Representatives of an institution may share student records with each other if they are "school officials" who have a "legitimate educational interest" in the information. FERPA gives institutions great latitude in defining both of these terms as long as an institution's definitions are included in its annual FERPA notice. Under this exception, all members of an institution's threat assessment team can share student records with each other if the institution has included team members in its definition of *school official*.
- **Health or safety emergency:** Student records *may* be disclosed in emergency situations to "appropriate persons" if the sharing of such information is necessary to protect the health and safety of the student or others. To use this exception, an institution must: (1) have a "rational basis" for deciding that a health or safety emergency exists, (2) document what emergency circumstances prompted its decision to disclose, and (3) define who is an "appropriate person" in its annual FERPA notice.
- **Certain disclosures to parents:** Two of FERPA's exceptions deal specifically with communications to a student's parents.

  A student who is claimed as a dependent by his or her parents for federal tax purposes: Any and all student records may be shared with a student's parents if the student is claimed as the parent's dependent for federal tax purposes. The one caveat is that a student must confirm tax dependency. As part of their registration, institutions can ask incoming students to confirm their status. Once the information is confirmed, team members or other representatives of the institution can disclose student records to parents without regard to FERPA.

  A student who is under 21 and has violated the institution's alcohol or drug use policy: An institution's representatives can share information about the violation to the student's parents regardless of whether that student is claimed as a tax dependent.
- **Certain disciplinary information:** FERPA permits a prior educational institution of a troubled student to disclose to officials at the current institution the student's records concerning disciplinary actions taken in response to conduct that posed a significant risk to the safety of the student or others. A representative from the prior institution may only disclose the disciplinary information to a school official who has a "legitimate educational interest in the behavior of the student."

FERPA's permissible disclosures provide sufficient latitude for threat assessment teams to receive, gather, and share student information. While the law is rarely an obstacle to discussing students of concern, team members should remain mindful that their discussions have the potential for stigmatizing those students, and they should always use discretion in their communications.

Medical Confidentiality Laws

Mental and physical health professionals, such as physicians, counselors, and psychologists, owe a duty of confidentiality to their patients, as defined by certain federal and state laws. In most situations, clinician confidentiality laws prohibit health professionals from sharing information about their patients (even the fact that the person is a patient) to others without receiving the person's consent to release this information.

While the laws seem restrictive, many experienced medical professionals maintain that their patients almost always give consent for such disclosures aimed at protecting the patient's best interests. In some exceptional circumstances, disclosures are permitted without consent. For example, many states allow the disclosure of patient information if there is substantial likelihood of preventing severe bodily harm through the disclosure.

To the extent that health professionals on a college or university campus are in a patient relationship with students, those individuals are generally prohibited from sharing information about them.

While campus medical professionals are far more restricted by their duty to maintain patient confidence than they are by FERPA, they can still assist an institution's student threat assessment team and even benefit professionally from their participation on it. For example, clinicians are always free to *receive* information about student patients. That information would give the medical professional a more complete picture of the student's life, which can aid treatment, diagnoses, and decisions to disclose patient information. Also, the medical professional can still share valuable insight on strategies for handling different types of troubling behavior without reference to a specific patient.

The intersection of medical confidentiality laws and state negligence standards is less clear. If a medical professional's patient commits suicide or harms someone else, the loved ones of the person injured may sue the professional for negligence for not disclosing information that might have prevented the harm. With the benefit of 20/20 hindsight, a clinician's decision not to disclose information is easy to second guess. However, these decisions are rarely clear-cut. With better access to information about a distressed student, there is an increased chance that a medical professional participating on an institution's threat assessment team will make timely decisions about disclosing patient information.

Document Information

Concerns about potential liability, FERPA, and record management keep some threat assessment teams from documenting their practices. A written record can improve a team's overall functioning and reduce its potential liability exposure.

Reasons to Document

A documentation process enables teams to improve their identification of potentially troubled students and their capabilities for responding to them. By maintaining notes, teams are better able to monitor which intervention strategies have been successful. Documentation also helps teams provide students with a continuity of care. If a fourth-year student comes to the team's attention, for example, members can easily see if they previously had involvement with the student, and that history will help inform their strategy.

A written record also helps teams track the performance and success of recommended case management strategies. Teams or their oversight committees can use this information to chart trends in their student caseloads, identify problems, and improve team practices and institution policies. Given staff turnover at institutions and the potentially large number of student cases that teams handle, it would be far more difficult to realize these benefits without a documentation system.

To date, no court has examined the adequacy of a college threat assessment team's actions. However, it is conceivable that a student who was discussed by a threat assessment team could bring a negligence lawsuit, and the court could review the team's actions. If this occurs, documentation can help the team show that it acted reasonably.

Documents are powerful pieces of evidence for determining what occurred. Records that are kept consistently and according to a thoughtful system can minimize an institution's liability exposure. Conversely, a team's behavior may seem arbitrary or unreasoned if the team lacks a record-keeping process or maintains inadequate records.

To the extent that documents created by a campus team contain identifiable student information, they are covered by FERPA. But fears over creating FERPA records should not prevent campus teams from recording valuable information. While FERPA allows a student to view his or her records, a documentation process that is executed with discretion and consistency can ease concerns about FERPA compliance while reducing potential liability.

Information to Document

A threat assessment team will benefit from establishing documentation practices that are executed consistently and capture enough information to show that the team acted reasonably. Documentation of the following information can help a team meet these goals:

- The student's name
- The date of the report
- The nature of the report or incidents involving the student
- The source of the report or departments involved in these incidents or both
- Its conclusions based on the team's analysis of the responses to the ultimate threat assessment questions (if the team performed a full inquiry to assess a student's concerning behavior):
  - Does the student pose a threat of harm to self or others?
  - If the student does not pose a threat of harm, would the student otherwise benefit from assistance or an intervention?
- If an intervention was recommended, a description of the intervention
- The results of the recommended intervention

Depending upon an institution's comfort level, a team may want to track more or slightly less information than what is listed. The institution's general counsel can help the team decide both the items of information and the level of detail that it will record and how to record it. Campus threat assessment teams also work with legal counsel to adopt practices aimed at decreasing concerns about the documentation they generate, such as:

- **Working through campus law enforcement:** Some institutions with a strong campus security or police force train them in the threat assessment process. Once trained, team reporting is directed through campus law enforcement. When a trained officer receives a report of troubling student behavior, the officer conducts the preliminary investigation or pre-inquiry (see "Pre-Inquiry—Decide the Need for Further Inquiry" on page 20). In appropriate cases, the officer may even perform a full inquiry investigation. At the next team meeting, the officer or the team's law enforcement representative apprises team members of the information gathered and talks with the team about ways to proceed. Through this practice, most of the documentation relating to the team's handling of a student is created and maintained by campus law enforcement.

  The advantages of this method are that team documents are likely to fall under FERPA's exception for law enforcement records, which can reduce concerns about FERPA compliance. Also, by having trained law enforcement officials gather the information needed for a threat assessment, the assessment process is carried out more uniformly and thoroughly.

For this practice to work, an institution must feel comfortable about assigning primary responsibility for reporting, investigating, and documenting to campus law enforcement rather than the threat assessment team. Some critics of this practice argue that assigning those responsibilities to law enforcement officers can alter the lens through which a team's issues are reviewed and evaluated. Law enforcement officials may be more likely to review cases with an emphasis on potential harm and less sensitivity to other concerns.

However, institutions that use their campus law enforcement officers to investigate and document student threat assessments say they avoid that potential difficulty by ensuring that the officers report their investigations to the team. Team members can then assume responsibility for cases in which there are troubling students but no risk of violence.

- **Limiting the number of team members responsible for documentation:** Some institutions delegate record-keeping responsibilities to a single person, such as an administrative assistant or the team's case manager. This process can improve the consistency and quality of team documents so long as the note taker is conscientious. If this method is selected, the person recording should receive some guidance on the level of detail expected. Also, the team or its oversight committee should periodically review the notes to make sure their content is accurate and appropriate.

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Appendix A

In Brief: Threat Assessment for Troubled Students

The following practical steps can by used by institutions to guide their actions when establishing a threat assessment team or improving the operation of an existing team. These steps provide a brief overview of key points made in this publication.

Forming a Threat Assessment Team

1. Lay the foundation

- Establish goals for a team, such as:
  - Prevent targeted violence
  - Reduce an institution's liability exposure
  - Break down information silos on campus
  - Coordinate decisions and response for student care
- Identify specific objectives, such as:
  - Address a variety of student behavioral concerns
  - Recommend improvements to relevant campus policies and procedures
  - Coordinate and share information with relevant campus groups
- Leverage pre-existing multidisciplinary relationships as a model for the team

2. Create the team

- Adopt a name that conveys the team's broad purpose.
- Select five to 20 team members to ensure representation across campus departments. Include representatives from:
  - Student affairs
  - Judicial affairs
  - Residence life
  - Student mental health services
  - Student health
  - Campus police
  - Academic affairs
- Consider representatives from legal affairs, disability resources, risk management, public affairs, or others with relevant expertise.
- Select a team chair based on personal traits rather than position on campus.
- Consider existing team models and adopt a team structure that will be most effective.

Train the team

- Conduct training to develop team expertise and effectiveness. Formats and topics may include:
  - Threat assessment specific training for team or violence subteam

- Legal training on information sharing and other issues related to the team's process and procedures
- Table top exercises using hypothetical scenarios
- "Lessons learned" exercise using actual cases handled by the team

Reporting Student Behavioral Concerns

1. Identify potential reporting sources

- Consider reporting sources such as:
  - Students
  - Faculty and staff
  - Parents or other close relatives
  - Online acquaintances
  - Community members
  - Local agencies or service providers

2. Educate potential reporters

- Publicize the threat assessment team's existence and purpose.
- Appoint a team member as a liaison for every campus department and use these liaisons to reach out to departments.
- Reach out to local hospitals, mental health facilities, and the police department.
- Educate reporters on reporting methods through:
  - Presentations
  - Webpage
  - Online training
  - Publications

3. Create practical reporting options

- Create a climate that promotes reporting.
- Develop reporting methods that are simple to use and quick.
- Offer many methods for reporting information to the team including an anonymous reporting option.

4. Assess the effectiveness of education and reporting methods

- Conduct an annual audit to assess effectiveness of education and reporting methods by:
  - Maintaining reports submitted to the team
  - Examining education and reporting methods used
  - Evaluating the reports received and the source of each report
- Identify and correct problems that prevent reporting.

Assessing and Intervening with Students of Concern

1. Initial Screening

- Determine whether the situation reported to the team constitutes an emergency.
  - If there is an emergency, report the matter to the local police immediately.
  - If reported to police, proceed with a full inquiry.
- Consider information about the student that is contained in the report and is already known by any team member.

2. Preliminary Inquiry

- Decide whether the team needs to conduct a full inquiry.
- Gather information from threat assessment team records, student affairs, campus police and local law enforcement, judicial affairs, academic affairs, residence life, and online resources.
- Answer triage questions focused on the student's potential to commit violence:
  - Has the student mentioned any violent thoughts or plans, including those of suicide?

- Have there been any behaviors that cause concern for the person's well-being, such as behavior that is significantly disruptive to the campus environment?
- Does the student own, or is he or she attempting to acquire, weapons?

- If the answer to any question is yes, proceed with a full inquiry.
- If the answer to all questions is no, consider other problems the student may be facing and appropriate intervention strategies.

3. Full Inquiry

- Determine whether the student poses a threat of violence or otherwise needs assistance.
- Gather information from preliminary inquiry sources, other potential reporting sources, prior schools, email, or Internet communications.
- Assess information about the student using the 11 assessment questions recommended by U.S. Secret Service and Department of Education (see pages 22-24).
- If the team concludes that the student poses a threat or needs assistance, select an intervention strategy.

4. Intervention

- Identify the goals for an intervention, such as reducing a threat posed or managing a student's concerning behavior.
- Select a strategy from the list at Appendix D by considering:
  - Information gathered by the team
  - Opinions from legal counsel, experts, and others familiar with the student
  - The feasibility of providing the intervention and its potential effectiveness
- Monitor the student's progress.
- If the intervention is not effective, select another strategy.

Sharing and Documenting Information

1. Share information

- With the assistance of legal counsel, develop an understanding of the laws related to the permissibility of sharing student information among team members and with other constituencies on and off campus.
- Focus particularly on state negligence laws, FERPA and its exceptions, state and federal medical confidentiality laws, and state privacy laws.
- Share information that serves the student's best interests.

2. Document information

- Maintain documentation to improve team procedures and to reduce potential liability arising out of team actions.
- Adopt consistent documentation practices that capture enough information to demonstrate that team actions are reasonable.
- Consider documenting:
  - Student name
  - Date of report
  - Incident reported
  - Source of the report or departments involved or both
  - Conclusions from any inquiry the team performed
  - Recommended intervention
  - Results of the intervention
- Review the team's documentation procedures with legal counsel.

Appendix B

LIAISON CHART		
Department	Department Contact Person and Contact Information	Threat Assessment Team Liaison and Contact Information

Appendix C

EDUCATION AND REPORTING METHODS AUDIT					
(1) Potential reporter	(2) Education methods	(3) Frequency of education	(4) Reporting methods	(5) Problem(s) identified during annual review of reports	(6) Improvements to education and reporting methods
Fellow Students					
Faculty					
Staff					
Parents					
Concerned others					
Neighbors					
Local service providers					

Appendix D

Student Intervention Strategies

- **Talk to the student.** Most people who come to the attention of threat assessment teams respond positively to someone who hears their concerns and demonstrates care for them and their situation. Threat experts note that the best way to defuse many potentially violent situations is to give the student with a grievance the opportunity to feel heard and validated. This often enables the student to move beyond his or her thoughts and plans of violence. However, each situation should be evaluated independently to determine whether such direct follow-up might serve as an aid or escalate the problem.
- **Identify an ally or trusted person.** An effective working relationship with a student of concern is often facilitated by enlisting help from someone the student already trusts. The trusted ally can try to encourage the student to take advantage of intervention strategies that are in his or her best interests. The ally might be a friend, fellow student, faculty advisor, mentor, coach, supervisor, residential advisor, spouse, parent, or someone else on campus whom the student already trusts.
- **Notify parents, other family members, or guardians.** In many circumstances, it is beneficial to notify the student's parents or other family members, and in most cases, they are helpful to the student. However, team members should check the records to evaluate whether the family will be effective allies or exacerbate the student's difficulty.
- **Involve law enforcement.** It will be necessary to call local or campus law enforcement to handle a student of concern in certain circumstances, such as if a crime has been committed or there is an emergency or an imminent threat of harm. However, in other situations, the need for law enforcement personnel may not be clear-cut. In these times, teams should determine whether a law enforcement intervention will further aggravate or help the student's situation and the institution's safety.

- **Permit student leaves (voluntary, interim, or involuntary).** A leave from campus may be beneficial for a student, but it may not address the underlying problem causing the student's behavior or eliminate the threat the student poses. Once a student is removed from campus, the team has far fewer options for monitoring and engaging that student. Consider the following:
  - **Voluntary leave:** A break from school may be beneficial for students who are experiencing serious mental health problems. They may be in a better position to recover or manage their symptoms at home or in a less stressful

environment. They may also benefit from specialized counseling or treatment away from campus.

The institution should have written policies for voluntary leaves or withdrawals and the criteria to approve them. The school should also clarify with the student such matters as refunds of tuition or housing payments, recording of the leave on transcripts and other college documents, and conditions for returning to active student status. Other potential issues include a student's request to complete coursework on a distance basis and waivers of transfer credit limitations or residency requirements to allow the degree to be completed at another school.

A voluntary leave of absence or withdrawal is usually preferable to an involuntary withdrawal. Voluntary leaves do not invoke the rigorous legal requirements necessary to place a student on an involuntary leave. Many students will agree to a voluntary leave or withdrawal rather than face the possibility of an involuntary withdrawal. Consistent with applicable guidelines, the student and the institution are free to structure the voluntary withdrawal agreement in a mutually beneficial way.

- **Interim suspension:** Where safety is of immediate concern, an educational institution may place a student on an interim suspension to temporarily remove him or her from campus. In these situations, federal law requires that colleges provide the student with minimal due process, which includes notice and an initial opportunity to address the evidence. For students with disabilities, the Office for Civil Rights of the U.S. Department of Education has stated that as soon as practicable the college should provide the full procedural rights applicable to involuntary withdrawal proceedings. An institution should consult with legal counsel to ensure its policies and actions regarding interim suspensions are lawful.
- **Involuntary leave:** An institution should use an involuntary leave only in extraordinary cases and when all other efforts to help the student stay in school and get assistance have failed. To place a student on an involuntary leave, the institution must clear certain legal hurdles. First, federal law requires that an institution show that the student constitutes a "direct threat" to the health or safety of self or others. To show that a "direct threat" exists, the institution must conduct an "individualized and objective assessment" of the student's ability to participate safely at the college. This assessment must be based upon current medical knowledge or the best available objective evidence and it must ascertain: (1) the nature, duration, and severity of the risk, (2) the probability that potentially threatening injury actually will occur, and (3) the advisability of modifying policies, practices, or procedures to mitigate the risks.

  Given this high standard, institutions should work with legal counsel to invoke an involuntary leave without violating the law. Legal counsel can help institutions create a written policy for involuntary student leaves and work with the team to make sure their actions comply with the law.

- **Remove from housing.** Students whose behavior threatens the health and safety of themselves and others should not live in campus housing. Similar to the involuntary leave requirements, before a student can be removed from housing, federal law requires that the college make an "individualized and objective assessment" of the student's ability to participate in the housing program. The finding that a student constitutes a "direct threat to himself, herself, or others" would be sufficient to deny housing.

  When considering whether to remove a student from

housing, institutions should consult legal counsel to make sure the policies and actions are in accordance with the law.

- **Mandate a psychological assessment.** Psychological assessment is appropriate when the student indicates that his or her behavior may be a result of a psychological condition. For example, the assessment process may be invoked when a student poses a risk of harm to others, threatens or attempts suicide, is incapacitated due to drug or alcohol use, or is treated by emergency medical personnel. The primary purposes of these evaluations is to assess functioning and needs and to recommend relevant treatment or interventions.

  Such assessments of students may be provided through on-campus mental health professionals or off-campus resources, but a team member should maintain contact with the medical professional performing the assessment. Moreover, under the law it appears that institutions may use a mandatory assessment as the basis for determining whether a "direct threat" exists for purposes of federal disability law.

- **Monitor involuntary hospitalizations.** Team members should be knowledgeable about relevant state laws and procedures regarding involuntary hospitalization or committal. When a team member facilitates or becomes aware of a student's committal, he or she should work with the student and the treating mental health professionals at the involuntary commitment facility. The team's liaison should coordinate with the treating mental health professionals to request that the student sign a release allowing student information to be shared with the team liaison. Information from the treating clinician about the student can help the team assess the student's situation and promote continuity of care if the student returns to campus.

- **Modify campus procedures.** Some situations are best resolved by changing the practices or the environment that may be causing the student's concerning behavior. *For example, a student may react inappropriately to a burdensome procedure. The student's behavior must be addressed, but if the procedure or policy tends to provoke discord then it should be reviewed and revisions considered.*

- **Act to protect the victim.** In addition to interventions with the student of concern, the team should also consider intervention actions that increase the safety of potential victims. Such protective efforts may include:
  - Providing administrative leave for the potential victim to minimize exposure to the potential danger.
  - Moving the potential victim to another location where he or she is in a more secure environment or harder to locate.
  - Modifying security and access to the potential victim if possible (by locking access doors or verifying identity before providing access).
  - Coaching potential victims regarding personal safety approaches (such as monitoring and being aware of their environment, varying their routes of travel, traveling with friends or colleagues).

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