



Behavioral Intervention Team Policy Manual

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I. Policy Overview

This policy provides a procedure and mechanism by which violence, threats of violence, and behaviors that are disruptive to institutional activities may be reported, evaluated, and addressed.

A. Scope

This policy applies to all University students, faculty, staff, and visitors to the campus and associated activities and events, regardless of location, sponsored by the University or a university-recognized organization.

This policy does not provide for the adjudication of misconduct by, discipline of, or imposition of sanctions on employees or students. Such actions may, however, be taken against individuals whose behavior is addressed under this policy pursuant to the University's regular employee or student disciplinary policies and procedures.

A. Related Policies and Resources

- [Life on the Hill Student Handbook](#)
- [Student Code of Conduct](#)
- [Faculty Handbook](#)
- [Emergency Action Plan](#)

B. Classifying Threat and Risk

Threat: A stated intention to inflict injury, damage, or hostile action on someone or their property, whether the intention is expressly stated or implied, whether the person communicating the threat has the ability to carry out the threat, whether the threat is made on a present, future, or conditional basis, or whether the threat is made in person, through another person, in writing, over the phone, in the mail, electronically, or by any other means.

Extreme Risk Behavior: Behavior that appears to pose a clear and imminent threat of violence or self-harm and requires immediate containment. It requires law enforcement, target protection, and development of a threat management plan. It includes, but is not limited to:

- Possession of unauthorized weapons (guns, knives, etc.) on campus;
- Possession of bombs or bomb-making materials;
- Specific threats or plans to inflict harm to self and/or a named individual (e.g., a threat to shoot a named individual)

Elevated Risk Behavior: Behavior that appears to pose a present threat of violence or self-harm, but lacks immediacy. It requires development of a threat management plan. It includes, but is not limited to:

- Physical, drug-related, or psychiatric disorders that may pose a potential harm to the physical well-being of the individual or others;
- Talk of suicide or self-inflicted injury (suicidal ideations);

- Physical action short of actual contact/injury (i.e., moving closer aggressively, waving arms or fists, yelling in an aggressive or threatening manner).

Moderate Risk Behavior: Behavior that does not appear to pose a present imminent threat of violence or self-harm but does involve a significant risk of disruption to the university's educational and administrative activities. It requires referral and the development of an active monitoring plan. It includes, but is not limited to:

- General, specific, or implicit threats, whether or not made in a "joking" manner (i.e., "you better watch your back," "I'll get you," or "you'll be sorry"), including the use of any electronic means of communication;
- Stalking behavior; and
- Vague statements regarding suicide or self-inflicted injury, violent thoughts, or violent intentions.

Mild Risk Behavior: Behavior that, while does not appear to pose a present threat of violence or self-harm nor a significant risk of disruption, does prove the basis for a reasonable concern that a threat of violence or self-harm or significant risk of disruption may develop. It is to be reviewed periodically to determine whether the subject individual's conduct has escalated to the level of "moderate risk." It includes, but is not limited to:

- Writing stories, poems, or essays or producing images that express or otherwise indicate a potentially dangerous fascination or preoccupation with violence to self or to others;
- Displaying a radical change in personal behavior, academic or workplace performance, appearance, or conduct.

No Identified Risk: Behavior that does not appear to pose a threat of violence or self-harm at this time, nor is a significant disruption to the community expected. Close after proper documentation.

Employee: Any full- or part-time employee of the university, including, but not limited to: faculty, adjunct faculty, staff, student workers, and contract employees.

Student: Any individual enrolled at the university and currently taking courses on a full- or part-time basis. An individual's status as a student who shall be deemed to encompass all activities carried out in connection with his/her application for admission to the university.

Visitor: Any non-employee or non-student present on the university campus or at any university-controlled location for any purpose, professional or private. This includes both invited and uninvited guests.

Workplace/Education Setting: Any location, either permanent or temporary, where faculty, staff, or student perform any work-related duty or are involved in educational activities and/or university sanctioned events. This includes, but is not limited to campus buildings and the surrounding perimeters, including the parking lots, field locations, student housing, and alternate work locations.

- C. Threat Management:** An active, individualized case management plan based on information gathered in an investigation and on other facts known about the subject(s). it is intended to help de-escalate, contain, or if possible, control a subject who has either exhibited “extreme risk behavior” or “elevated risk behavior” as defined below; to decrease the vulnerabilities of possible targets of such behaviors’ to discourage escalation of the circumstances’ and to prepare for an mitigate against precipitation events that may trigger such behaviors.
- D. Active Monitoring:** An active, individualized case monitoring plan based on information gathered in an investigation and on other facts known about the subject(s). it is intended to facilitate the monitoring of a subject who has exhibited either “moderate risk behavior” or “mild risk behavior” as defined below and to provide for periodic re-assessment of a subject’s behavior and corresponding potential threat level. Active monitoring may also be used as a follow-up to a threat management plan to ensure that extreme and/o high risk behaviors is effectively managed.

II. Roles and Responsibilities

A. Behavioral Intervention Team (BIT)

- 1. Mission and Objectives:** This policy establishes a BIT as a mechanism to assess campus violence, threats, and/or risks as appropriate, regardless of the University location, educational activities, and/or University sanctioned events. The BIT’s mission is to provide a proactive and coordinated strategy that identifies behavior that falls into the extreme risk, high risk, moderate risk, and low risk classifications defined above. Key objectives for the team include:
 - Providing a repository for information about behavioral concerns across different campus sites so as to identify persons in distress as early as possible;
 - Facilitating timely communication among different campus sites about individual behavioral concerns;
 - Investigating or gathering information about individuals of concern including individuals outside of the University Community;
 - Assessing the information so that the BIT can devise an appropriate response;
 - Recommending interventions, threat management plans, active monitoring plans, and other case management strategies that connect individuals of concern with needed resources;
 - Recommending plans for reintegrating a subject once initial actions are complete and the threat eliminated;
 - Assisting with education of the campus community about the types of behavior or concerns that they should report to the BIT members;
 - Developing policy recommendations based on an evaluation of data on individual behavior dealt with by the BIT.

2. Goals and Objectives for the Behavioral Intervention Team:

- Provide a safe and supportive physical and emotional environment for members of the University community.
- Identify, assess and intervene with individuals who are struggling or who demonstrate concerning or threatening behavior.
- Provide support and resources to community members who are concerned for another individual and also to the person of concern.

3. Membership

The BIT Team shall consist of:

- Director of the Student Health and Counseling Center, Chair
- Associate Vice President for Student Affairs, Co-Chair
- Student Health Center Medical Director
- Department of Public Safety Representatives (2)
- Director of Residential Life and Housing
- Director of Disability Services
- Deputy Title IX Coordinator for Students
- Crisis Prevention Counselor
- Health Services Counselors (2)
- Senior Women's Athletic Administrator
- Faculty Representatives (2)

Additional members may be included as required by the specific circumstances of a particular situation.

4. General Principles

The BIT will use a team-based approach to respond to reports of students, faculty, and staff having difficulties and/or demonstrating concerning behaviors. The BIT shall guide the process from internal assessment to planning interventions with the objective of reducing the risk. This includes the development of a recommended plan for reintegration of the subject once initial actions are complete and the threat eliminated.

The BIT will utilize available resources and additional members as appropriate to assist it in gathering information about a student, employee, visitors, or other University community member exhibiting behavioral concerns. The BIT may consult with other appropriate staff and/or mental health experts in carrying out its assessment function. It is recognized that multi-disciplinary consultation is a critical part of the threat assessment protocol.

The BIT Chair shall be the custodians of BIT records, both electronic and hardcopy.

As indicated in this Policy, the BIT does not prescribe discipline or treatment. It is limited to addressing reported behaviors involving violence, threats of violence, or risks of disruption by gathering information, making assessments, and providing recommendations.

5. Process:

- **Report of Concern:** The BIT may receive written or verbal reports about behaviors of concern from any member of the campus community, including its own members. A verbal report, when needed depending on the situation, should be followed by a written report. Situations involving *extreme risk behaviors* should be immediately reported by the BIT and to Department of Public Safety.
- **Inquiry/Investigation:** Upon receiving a report, the BIT will focus upon determining whether or not the individual of concern possesses, based on past and/or present behavior, a threat of violence or risk of disruption. The BIT may gather information and facts from all available sources. It shall be granted access, as appropriate, to a student's record, including his/her disciplinary record, and to an employee's employment record. It may contact individuals with information about reported incidents or actions involving the individual of concern, as well as others (faculty, staff, students, local authorities, medical professionals, parents and family members, acquaintances, and other individuals who may know the individual or have pertinent knowledge). These inquiries may be made by designated members of the BIT individually or may be carried out by the BIT acting as a convened group, such as by interviews conducted by the BIT when convened.
- **Assessment and Development Plan:** Based on information gathered by the BIT, it shall make a risk assessment of the subject individual's reported behavior and classify such behavior as "extreme risk," "high risk," "moderate risk," "low risk," or "no risk." The BIT shall then develop a plan, as and if required by this Policy, for the risk classification that it has identified. The BIT shall complete a risk assessment and develop a plan regardless of the outcome of any criminal proceedings initiated by law enforcement authorities and/or any disciplinary proceedings initiated by the University.
- **Referral/Recommendation:** The BIT may make referrals or recommendations to appropriate University personnel that may include: (1) The initiation of disciplinary action, provided for in the University Catalog, Student Handbook, the University Policy Manual and/or the Employee Handbook; (2) Conveying recommendations to the pertinent administrative unit in each case; (3) Recommending that the subject faculty or staff employee or student be referred for professional counseling; (4) Recommending the filing of criminal charges; and (5) Recommending other actions as deemed appropriate.
- **Conclusion:** Once the BIT has determined that the individual of concern does not pose or no longer poses a threat of violence or risk of

significant disruption, the matter will be considered closed for purposes of this Policy. Involved parties may be informed when a situation is concluded. Reports regarding the disposition of the incident will be conveyed to the affected reporting individual(s), whenever possible and allowed by law.

- **Action by Other Officials:** The closing of a matter by the BIT is completely independent of, and shall have no effect upon:
 - **For any individual of concern:** the initiation or continuation of a law enforcement investigation into the individual's conduct by campus or local law enforcement authorities and/or the institution of criminal proceedings against such individual.
 - **For a student of concern:** referral for counseling, the initiation of student disciplinary proceedings or other appropriate action by Student Affairs officials.
 - **For an employee of concern:** referral for counseling, the imposition of disciplinary sanctions or the initiation of disciplinary proceedings, or other appropriate action by the employee's supervisor or other authorized officials.

It is anticipated that conduct violating University Policy or rules or federal, state, or local law will be addressed by institutional or civil/criminal proceedings initiated by those officials with the enforcement responsibility for such policy, rules, or law.

6. **Meetings:** The BIT team meets bi-weekly to address these important issues. However, the Chair can call an emergency meeting upon receipt of a report of conduct that may fall into the "extreme risk" or "elevated risk" behavior classifications. The BIT shall ordinarily meet within 48 hours of receipt of an initial report regarding conduct that appears to fall into the "moderate risk" behavior classification, and it shall meet within a reasonable time under all the circumstances with respect to conduct that falls into the "mild risk" behavior classification. In the absence of active cases, the BIT shall be convened as called by the Chair to review relevant topics in the area of threat assessment, behavioral statistics, resource availability, etc. Other topics, such as campus policies, state and federal law and regulations, ethical issues, and confidentiality concerns may also be scheduled for discussion and review.
7. **Report:** An end of year report shall be submitted to the Vice President for Student Affairs at the end of each academic year.

B. University Community

Each member of the University has a role and responsibility in helping promote a safe and secure environment for the University environment.

All persons are strongly encouraged to be aware of their surroundings and to be alert for behavior that may present a threat of violence or risk of disruption. Students,

faculty, and staff should be familiar with this Policy and with the mechanisms for reporting actual or potential threats to the University community.

Duty to Report: Members of the University community (students, faculty, and staff) are encouraged to immediately report any situation that involves behavior by a student, employee, or campus visitor, behavior that is or may be threatening to the health and safety of the individual or of others, or behavior that is or may be disruptive to the University's educational and administrative activities. Any member of the University community who becomes aware of such a situation should report the matter to the appropriate college personnel, the BIT, and/or the Department of Public Safety as appropriate to the observed behavior (see University catalog and student handbook).

Faculty, staff, and students, who in good faith make such reports, shall not be subjected to retaliation or harassment by the University or any of its officials.

Making a false or misleading report under this Policy, with knowledge or reckless indifference as to the falsity of the matter reported, shall be considered misconduct and may result in disciplinary action under the University's student and/or employee disciplinary procedures.

C. Potentially At-Risk Students and Employees

Some employees can be at risk for violence/hostility because of the nature of their jobs. Other employees or students can be at risk because they are subject to violence, threats, or harassment from a current or former spouse, partner, or other third party. Department of Public Safety, Human Resources, Associate Vice President for Student Affairs, the Health and Counseling Center, and other offices will work with at-risk students and employees and their supervisors, to develop safety plans that address the specific risks they face.

- 1. Domestic/Partnered Violence in the University Environment:** In an effort to promote a safer work environment, employees who are the victims of domestic violence or who believe they may be the targets or victims of such violence, should promptly notify their supervisor, an appropriate administrator, Human Resources, the BIT, or the Department of Public Safety.

Likewise, to promote a safer educational setting, students who are victims of domestic violence or who believe they may be targets of such violence, are encouraged to promptly notify the appropriate administrator (to include, but not limited to, the Associate Vice President of Student Affairs, a BIT team member, or the Department of Public Safety).

Faculty, staff, and students who have Protective Orders should provide copies to Department of Public Safety so that this office can:

- Ensure appropriate law enforcement actions occur; and
- Assist in maintaining the safety of potential victims.

Examples of Protective Orders may include:

- Any order issued by a court that is intended to prevent one party from approaching another, often within a specified distance; or
- Any order issued by a court that is meant to protect a person from harm or harassment.

Confidentiality will be maintained to the extent allowed by law.

III. Reporting Threats and Violence

A. Extreme Risk Behavior

A situation possibly involving “extreme risk” should be considered an emergency and should be immediately reported to the Department of Public Safety. This department may be reached as follows:

- **Ext. 5555** from a campus phone
- **256-372-5555** from any phone in case of a true emergency or immediate harm.

Examples of extreme-risk, emergency situations include, but are not limited to the following:

- Possession of unauthorized weapons (guns, knives, etc.) on campus, especially in buildings
- Possession of bombs or bomb-making materials
- Physical assault or attempted assault, with or without weapons
- Specific threats to inflict harm to self and/or a named individual (e.g., a threat to shoot a named individual).

B. Elevated, Moderate, and Mild Risk Behavior

Any situations involving a threat of violence or a risk of disruption that is clearly not within the “extreme risk behavior” classification should be reported pursuant to this section.

A report of concern about a student or employee whose conduct may represent a threat of violence or a risk of disruption may be made to Campus Police, and then any member of the BIT. Contact information is as follows:

- **Ext. 5555 from an on-campus phone (DPS)**
- **Ext. 5611 from an on-campus phone (AVP for Student Affairs)**
- **Ext. 5601 from an on-campus phone (Health and Counseling Services)**

Examples of conduct that fall under the reporting duty for “non-emergency situations” include the following:

- A radical change in a person’s behavior, academic or workplace performance, appearance or conduct;
- Aggressive or irrational behavior through words and/or actions;
- Severe depression, unhappiness, or irregular emotional behavior;

- Inability to control anger, confrontational or disturbing words or actions;
- Unusual overreaction to normal circumstances;
- Damage to property;
- Unusual nervousness, tension, or anxiety;
- Expression of suicidal thoughts, feelings, or acts;
- Any other action word, or behavior that one may reasonably believe could lead to violence;
- Threatening statements, displays, photos, or other publications in electronic format or communication;
- Other examples as found in risk definitions above (see Section I.D).

C. Confidentiality

All reports will be handled in a confidential manner whenever possible. The BIT will take reasonable steps to maintain the privacy of those who make a referral, if requested. If the circumstances do not allow privacy to be maintained, this will be discussed with the person making the referral. Information will be released on a need-to-know basis within the University Community and in accordance with local, state, and federal laws and University Policies. University administrators will be sensitive and responsive to the potential for reprisal directed at employees or students who report problematic behavior as specified within the scope of this Policy.

IV. Education and Training

A. University Community

For this program to be effective it is important for the University community to be aware of this Policy and the BIT, the kinds of behaviors encompassed within this Policy, the importance of reporting such behaviors, how to contact members of the BIT with concerns or comments.

The BIT will provide campus-wide informational meetings that will be incorporated into faculty and staff professional development workshops, new employee and student orientation sessions, and regularly scheduled safety programs presented by the Department of Public Safety, and other campus health and safety organizations. In addition, the BIT will provide an overview of the program, listing of BIT members, and reporting guidance and instructions by way of the University website and other modes of communication it deems appropriate.

Training for students, faculty, and staff shall consist of, but is not limited to the following:

- Informational Opportunities: Five-minute presentations, brochure distribution, emails to all students and employees, and webpage development addressing the following:
 - What is the BIT and what is its mission;
 - What characteristics to look for in persons of concern

Department heads are encouraged to schedule training for supervisors and managers and to provide similar training for other staff as appropriate.

B. BIT Members

It is expected that the BIT members (Section II.) will participate in threat assessment training and professional development opportunities, and will be familiar with laws, regulations, and University policies applicable to the scope of the BIT's mission.

C. Family Educational Rights and Privacy Act (FERPA)

FERPA protects student education records and information in them from disclosure, subject to certain recognized exceptions. One such exception allows a University official to make disclosure when an emergency exists, and disclosure is necessary to protect the health or safety of the student or other individuals.

The determination of whether or not "necessity" exists requires a consideration of the seriousness of the health or safety threat, the extent of the urgency in time, the need for the information, and the ability of the recipient of the information to deal with the emergency. The Associate Vice President for Student Affairs may aid in making this determination.

In addition, it is important to understand that a faculty or staff member's observations of a student's behavior are not within the scope of FERPA. For example, if a faculty or staff member sees a student exhibiting threatening behavior, the faculty or staff member may contact an appropriate University official for guidance on how to respond. In such a situation, an appropriate official might include the Campus Administrator on Duty, a Division Chair, any member of the BIT, etc.

Disclosure of confidential student information to parents should only be made when consistent with FERPA and then only by the Associate Vice President for Student Affairs. The release of information about college students to the media should only be made by the Office of Marketing & Public Relations.

V. Policy Maintenance

Annual Review of Policy Procedures

This Policy and the procedures contained within it shall be reviewed and updated annually or more frequently if organizational or situational changes warrant. The BIT is responsible for conducting all reviews and updates. The President's Cabinet has final approving authority for all Policy changes.