



Behavioral Evaluation and Threat Assessment Policy

Annex F of the UAHuntsville Emergency Management Plan

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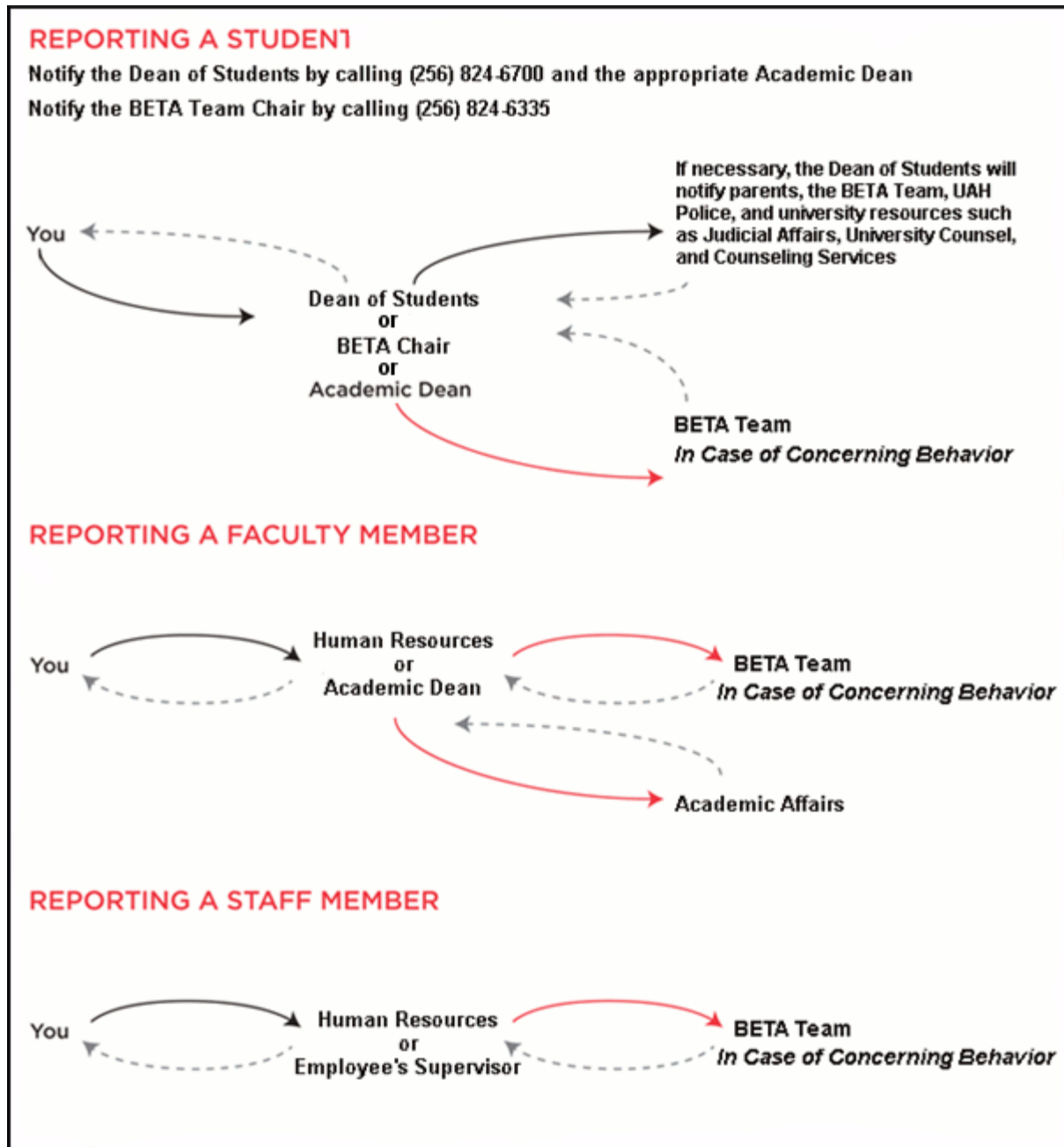
Appendix A: Record of Reviews and Revisions

Appendix B: Incident Report Form

QUICK GUIDE FOR REPORTING CONCERNING BEHAVIOR

Report emergency Situations involving behavior that appears to pose a clear and immediate threat of violence or self-harm immediately to UAHuntsville Police by dialing **911**.

For situations where there does not appear to be an immediate risk, refer to the following diagram:



I. Introduction and Objective

A. Overview

The University of Alabama in Huntsville (UAHuntsville) is committed to promoting a safe and secure working and learning environment. Violence, threats of violence, and behaviors that are disruptive to institutional activities are inconsistent with this objective and are unacceptable.

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.

B. Scope - Who Is Covered By This Policy

This Policy shall apply to all UAHuntsville students, faculty, staff, and visitors to the campus and to activities and events occurring on all University-owned and/or controlled property, buildings, facilities, etc. and to activities and events, regardless of the location, sponsored by the University or by 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 action 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.

C. Related Policies and Resources

- UAHuntsville Campus Safety Guide – (<http://safety.uah.edu>)
- UAHuntsville Faculty Handbook – (<http://www.uah.edu/facsen/Faculty%20Handbook/TOC2.htm>)
- UAHuntsville Staff Handbook – (<http://www.uah.edu/admin/HR/policies/Staff%20HandBook.pdf>)
- UAHuntsville Student Handbook – (http://www.uah.edu/student_life/handbook/)
- UAHuntsville Student Housing Handbook – (<http://housing.uah.edu/forms/1011handbook.doc>)
- UAHuntsville Emergency Procedures Handbook (<http://emergency.uah.edu/handbook.pdf>)

D. Contacts

The UAHuntsville Behavioral Evaluation and Threat Assessment (BETA) Team, in consultation with the Office of Dean of Students (for student concerns), Office of Academic Affairs (for faculty concerns) and/or Human Resources (for employee concerns), and with guidance from the Office of Counsel shall officially interpret this Policy and shall revise or modify it as necessary to meet the changing needs of the

University. Please direct policy questions to the Chair of the BETA Team.

- Human Resources: 256-824-6545
- Academic Affairs Office: 256-824-6335
- Office of Dean of Students: 256-824-6700
- Associate Provost / Chair of the BETA Team: 256-824-6335

The following provides a list of contacts that may be helpful for non-policy questions:

- UAHuntsville Police Department / Emergency: 911
- UAHuntsville Police Department / Non-emergency: 256-824-6596
- UAHuntsville Counseling Center: 256-824-6203
- Student Health Center: 256-824-6775
- Faculty & Staff Clinic: 256-824-2100
- Mental Health Center of Madison County: 256-533-1970
- Crisis Hotline (24 hours): 256-533-1970

E. Definitions

Threat: A stated intention to inflict injury, damage, or hostile action on someone, 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.

Threat Management Plan: 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 exhibited either “extreme risk behavior” or “high 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 and mitigate against precipitating events that may trigger such behaviors.

Active Monitoring Plan: An active, individualized case monitoring plan based on information gathered in an investigation and on other facts known about the subjects(s). It is intended to facilitate the monitoring of a subject who has exhibited either “moderate risk behavior” or “low 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-on to a threat management plan to ensure that extreme and/or high risk behavior is effectively managed.

Extreme Risk Behavior: Behavior that appears to pose a clear and immediate 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;
- 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).

High 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 or emotional well being of the individual or others;
- Talk of suicide or self-inflicted injury;
- Physical actions 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 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 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;
- Vague statements regarding suicide or self-inflicted injury, violent thoughts, or violent intentions.

Low Risk Behavior: Behavior that, while it does not appear to pose a present threat of violence or self-harm nor a significant risk of disruption, does provide 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 which does not appear to pose a threat of violence or self-harm at this time, nor is significant disruption to the community expected. Close case after proper documentation.

Employee: Any full- or part-time employee of the University, including, but not limited to: exempt, non-exempt, faculty, adjunct faculty, GRAs, GTAs, student workers, leased and contract employees.

Student: Any individual enrolled at the University in any of the recognized admission categories (undergraduate, graduate, etc.) and currently taking courses on a full- or part-time basis. An individual's status as a student 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/Educational Setting: Any location, either permanent or temporary, where faculty, staff, or students 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.

II. Roles and Responsibilities

A. Behavioral Evaluation and Threat Assessment (BETA) Team

1. **Mission and Objectives:** This Policy establishes a BETA Team as a mechanism to assess campus violence, threats of violence, and risks of disruption and to respond to such violence, threats, and/or risks as appropriate. The BETA Team's mission is to provide a proactive, coordinated, and planned approach to the identification, assessment, management, and, where possible, reduction and/or prevention of 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 units so as to identify persons in distress as early as possible;
- Facilitating timely communication among different campus units about individual behavioral concerns;
- Investigating or gathering additional information about individuals of concern, including individuals outside of the University community;
- Assessing the information so that the University 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 the education of the campus community about the types of behavior or concerns that they should report to team members;
- Developing policy recommendations based on an evaluation of data on individual behavior dealt with by the team.

2. **Membership:** The Team shall consist of:

- Associate Provost (Chair, appointed by the Provost)
- Dean of Students
- Academic Dean (appointed by Provost)
- Dean of the College of Nursing (or designee)
- Assistant Vice President for Human Resources
- Director of Counseling Center
- Chief of Police / Director of Public Safety
- University Counsel Risk Management designee
- Faculty Senate Representative (nominated by the Faculty Senate for a three year term and appointed by the Provost)
- Staff Senate Representative (nominated by the Staff Senate for a three year term and appointed by the Provost)

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

3. **General Principles**

The BETA Team will use a case-management based approach to respond to reports of students, faculty, and staff having difficulties and/or demonstrating concerning behaviors. The BETA Team 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 BETA Team will utilize available resources and additional members as appropriate to assist it in gathering information about a student, employee, or other university community member exhibiting behavioral concerns. The BETA Team 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 UAHuntsville Office of Counsel shall be the custodian of BETA records, both electronic and hardcopy.

As indicated in this Policy, the BETA Team 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.

4. **Process:**

- **Report of Concern:** The BETA Team 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 BETA Team to the UAHuntsville Police Department (UAHPD).

- **Inquiry/Investigation:** Upon receiving a report, the BETA Team will focus upon determining whether or not the individual of concern poses, based on past and/or present behavior, a threat of violence or risk of disruption. The BETA Team 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, 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 BETA Team individually or may be carried out by the BETA Team acting as a convened group, such as by interviews conducted by the BETA Team when convened.
- **Assessment and Development of Plan:** Based on information gathered by the BETA Team, 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 BETA Team shall then develop a Plan, as and if required by this Policy, for the risk classification that it has identified. The BETA Team 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 BETA Team may make referrals or recommendations, as follows:
 - Make recommendations to appropriate University personnel that may include actions, including the initiation of disciplinary action, provided for in the Student Handbook, the Faculty Handbook, and/or the Staff Handbook. Recommendations will also be conveyed to the Vice-President of the pertinent administrative unit in each case.
 - Recommend that the subject faculty or staff employee or student be referred for professional counseling.
 - Make recommendation(s) for the filing of criminal charges.
 - Make recommendations for other actions as deemed appropriate.
- **Conclusion:** Once the BETA Team 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.
 - A student of concern may continue to be followed-up by Student Affairs and Academic Affairs offices.
 - An employee of concern may continue to be followed-up by his/her supervisor, employee assistance program personnel, Academic Affairs (faculty), and/or Human Resources.

- **Action by Other Officials:** The closing of a matter by the BETA Team 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 or by Academic 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.

5. **Meetings:** The Chair of the BETA Team shall call an emergency meeting as soon as is practicable upon receipt of a report of conduct that may fall into the "extreme risk" or "high risk" behavior classifications. The BETA Team shall ordinarily meet within 72 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 "low risk" behavior classification. As long as there are active cases being addressed under a Threat Management Plan or an Active Monitoring Plan, the BETA Team shall meet bi-weekly. In the absence of any active cases, the BETA Team shall be convened at least once each semester 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.
6. **Report:** A summary report shall be submitted to the President and Provost at the end of every semester.

B. University Community

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

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 BETA Team and/or UAHPD as appropriate to the observed behavior (see section III.A and III.B for information on how to report).

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.

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

C. Security Planning for 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 or partner, or other third party. UAHPD, Human Resources, the Office of the Dean of Students, the 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 BETA Team, or UAHPD. Employees may have additional services available through the Employee Assistance Program (EAP) and should contact the Human Resources Benefits Coordinator at 256-824-6545 for a listing of available EAP resources.

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 Dean of Students, the BETA Team, or UAHPD. Confidential advocacy services are available to students through the Counseling Center.

Faculty, staff, and students who have Protective Orders should provide copies to UAHPD 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.

- 2. Pre-Employment Screening and Criminal Conviction Background Checks:** Human Resources administers the University's policies on pre-employment screening and reference checks. Accordingly, Human Resources will advise hiring managers when potential problems are identified during this process.

III. Reporting Threats and Violence

A. Emergency Situations – Extreme Risk Behavior

A situation possibly involving extreme risk should be considered an emergency and should be immediately reported to UAHPD. UAHPD may be reached as follows:

- **6911** from a campus phone;
- **256-824-6911** from a cellular or off-campus phone;
- **911** from any phone (off-campus calls go to Madison County 9-1-1 Center).

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

- Possession of unauthorized weapons (guns, knives, etc.) on campus;
- 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. Non-Emergency Situations – High, Moderate, and Low 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. An incident form that may be used for such a report is available online at <http://emergency.uah.edu> and may be completed and submitted to BETA online or may be completed in hard copy and submitted in that form to BETA. BETA will be responsible for transmitting the information to the appropriate offices and/or departments.

A report of concern about a student whose conduct may present a threat of violence or a risk of disruption may be made to the Dean of Students and/or the Chair of the BETA Team.

A report of concern about an employee whose conduct may present a threat of violence or a risk of disruption may be made to the employee's supervisor and Human Resources. Human Resources will contact Academic Affairs if the employee is a faculty member.

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;
- Any threat or act of violence;
- 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.E).

C. Confidentiality

All reports will be handled in a confidential manner whenever possible. BETA 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 campus 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 behavior within the scope of this Policy.

IV. Education and Training

A. University Community Training

For this program to be effective, it is important for the University community to be aware of this Policy and the BETA Team, the kinds of behaviors

encompassed within this Policy, the importance of reporting such behaviors, how to contact members of the BETA Team with concerns or comments.

BETA will provide campus-wide informational meetings that will be incorporated into faculty and staff annual training workshops, new employee and student orientation sessions, and regularly scheduled safety programs presented by UAHPD and other campus health and safety organizations. In addition, BETA will provide an overview of the program, listing of Team members, and reporting guidance and instructions by way of the UAHuntsville web site, the student newspaper (*The Exponent*), 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 web page development addressing the following:
 - What is the BETA Team and what is its mission;
 - What characteristics to look for in persons of concern; and
 - How to submit a report to the BETA Team.
- Educational opportunities: Town Hall / Department Meetings – Fifteen minute PowerPoint presentations followed by question and answer sessions.
- Training Opportunities: In-depth training to assist members of the campus community in developing a skill set for assessing behavior that presents a threat of violence or a risk of disruption.

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

B. BETA Team Training and Education

Members of BETA will be trained in the National Incident Management System (NIMS) and Incident Command System (ICS). Required NIMS/ICS courses: IS-100.HE, IS-200, IS-700, IS-800.

It is expected that the individuals identified above (Section II.A) 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 BETA Team's mission.

C. A Note on the 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 Director of the Office of Public Safety/Chief of Police, the Dean of Students, or the University Counsel may provide assistance 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 members of the BETA Team, UAHPD, the Student Counseling Center, the Dean of Students, University Counsel, a department chair, etc.

Disclosure of confidential student information to parents should only be made when consistent with FERPA and then only by the Dean of Students. The release of information about University students to the media should only be made by the University’s Public Information Officer/Director of Public Affairs.

V. Policy Maintenance

Annual Review of Policy and 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 BETA Team is responsible for conducting all reviews and updates. The UAHuntsville Emergency Management Operations Group (EMOG) has final approving authority for all Policy changes.

The Emergency Management Coordinator is responsible for maintaining the Policy document and incorporating changes approved by the EMOG and will work with the BETA Team during each update period to provide draft and final versions of this Policy.

This Policy and all subsequent revisions shall be included as an annex to the University’s Emergency Management Plan.

Report of Concerning Behavior

*Behavior of concern (e.g. student making statements or writing about harming a person or group; student talking and/or writing about death; student seems depressed, refusing help, etc.):

Date of concerning behavior:

Time of concerning behavior:

Name of individual exhibiting concerning behavior (if known):

Other identification of individual (campus location, license plate number, etc.):

If other, please indicate:

**Would you be willing to talk with a member of the Behavioral Intervention Team, should they have questions? Yes No

Is there is a specific threat or upcoming event for which you are particularly concerned?

Required Information:

Your name:

Your telephone number:

Do you know anyone else who may have information that would assist the team in assessing the behavior of concern? Yes No

Additional contact name:

Additional contact telephone number:

*** IMPORTANT: If this is an emergency, call 911. If this requires immediate attention, contact UAHuntsville Police at 256-824-6911.**

Submit this form to the UAHuntsville Police, BETA Chair, Dean of Students, Academic Affairs, or Human Resources offices.

**** All reports will be handled in a confidential manner whenever possible.** BETA will take reasonable steps to maintain the privacy of those who make a referral, if requested.