



Northeastern
ILLINOIS UNIVERSITY

Team Handbook

**Behavioral
Concerns
Team**

**August
2009**

**Northeastern Illinois University
Behavioral Concerns Team**

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Contact Information:

Website: <http://www.neiu.edu/~bct>

e-mail to bct@neiu.edu will contact all members of the BCT

Behavioral Concerns Team: Representatives from the following offices

Student Activities
University Police

Dean of Students
Counseling Office

Emergencies

In the event of an emergency or crisis situation,
call **University Police** at **x5511**.

**Counseling Services,
D-024**
(773) 442-4650

**University Police,
PF-104**
(773) 442-5511

**Health Services,
E-051**
(773) 442-5800

**Dean of Students,
B-119**
(773) 442-4610

Introduction and Overview

The Behavioral Concerns Team (BCT) at NEIU has been developed as part of the campus Violence Prevention Plan. The overall goal of the BCT is to promote a safe environment for all, an environment that is focused on and enhances student learning and student development. This goal involves the collaboration of the entire University community in a proactive, prevention-minded approach to problematic behavior. It uses an early identification and response strategy to manage emerging situations with a focus on preventing escalation of concerning behaviors.

The Behavioral Concerns Team Plan was developed in accordance with the *College and University Behavioral Intervention Team (CUBIT)* model that was introduced by the National Center for Higher Education Risk Management (NCHERM). This model was developed in response to the Governor's Panel Report on the Virginia Tech shootings and the *Assessment-Intervention of Student Problems (AISP)* model introduced by Ursula Delworth. The Behavioral Concerns Team Plan complies with recommendations of the April 2008 *State of Illinois Campus Security Task Force Report to the Governor*.

Behavioral Concerns Team

Overall, the Behavioral Concerns Team seeks to increase communication, collaboration, and coordination regarding behavior that raises concerns or disrupts the university learning environment. The BCT enhances campus safety and promotes success by providing a centralized listening and response function regarding problematic behavior. This includes providing consultation and support to those dealing with the situations as they emerge, tracking and assessing incidents and patterns of incidents, responding to the individuals involved along BCT guidelines, and documenting all of the above.

The Behavioral Concerns Team is a multidisciplinary team that meets regularly to serve five major functions for the university:

1. Provide consultation and support to members of the university community in assisting individuals who display concerning or disruptive behaviors;
2. Respond to reports, gather information to assess situations involving individuals who display concerning or disruptive behaviors; engage reported individuals in a process aimed at correcting the disturbing behavior;
3. Recommend appropriate intervention strategies or disciplinary sanctions;
4. Connect individuals with needed campus and community resources;
5. Monitor ongoing behavior of individuals who have displayed disruptive or concerning behavior.

Team Membership

The Behavioral Concerns Team is composed of representatives from four critical areas of the campus community and includes:

- Dean of Students
- Lieutenant, University Police
- Director of Student Activities
- Clinical Psychologist from Counseling Office (Serves as Behavioral Concerns Team Facilitator)

Additional members from the campus community are included in meetings of the BCT as necessary.

Meetings

The Behavioral Concerns Team meets weekly to address reported behaviors and issues on campus. The team also focuses on emerging situations and topics related to concerning behaviors and appropriate intervention. These discussions include trends and patterns in reported behavior, best practices in intervention, and available resources.

Additional meetings are held as needed to assess, intervene, and monitor concerns brought to the attention of the BCT.

Assistance and Consultation to the University Community

Faculty, staff, and students may be confronted with situations in which an individual is disruptive or displays behavior that may be intimidating or threatening to others. A person may also behave in ways that signal other kinds of distress, such as tearfulness or withdrawal and isolation. The Behavioral Concerns Team is designed to assist in these situations by responding to reports with information gathering, assessment, consultation, and referral to resources. The BCT relies on the participation of the entire University community in its mission of preventing violence and responding to individuals in need of assistance.

Appendices A and B provide guidelines for faculty and staff in responding to *inappropriate student behavior* and for reaching out to *distressed/difficult students*. Appendix C provides guidelines for addressing situations that involve *non-students on campus*. While these guidelines provide general information and guiding principles, the BCT is available for in depth consultation about any troubling situation.

Reporting Process

The overall goal of the BCT is to promote a safe campus environment for all students and staff, one that focuses on student learning, development, and success. By encouraging all members of the campus community to report concerning behaviors, the BCT will be able to reach out to students or individuals to intervene, provide support, and connect them with resources that can assist them. As such, the Behavioral Concerns Team asks that the campus community report concerning “red flag behaviors.”

Examples of “Red Flag Behaviors”

A “red flag behavior” is a questionable, suspicious or inappropriate behavior that may be presented through an individual’s appearance, spoken or written words, or specific actions. Examples of “red flag behaviors” include:

- Behavior(s) which regularly interfere with classroom environment or management
- Notable change in academic performance – poor or inconsistent preparation
- Notable change in behavior or appearance
- Impairment of thoughts – verbally or in writing
- Aggressive behaviors toward others; inability to set limits or re-direct focus
- Poor decision making and coping skills
- Inappropriate or strange behavior
- Low frustration tolerance
- Overreaction to circumstances
- Lack of resiliency
- Writings and comments endorsing violence; unusual interest in violence
- Indirect or direct threats in writings or verbalizations
- Lack of empathy and concern for others; inability to care
- Anger management problems
- Threats to others
- Appearance of being overly nervous, tense or tearful
- Expression of suicidal thoughts or feelings of hopelessness
- Withdrawal and isolation

Report of Incident or Concern

The *Report of Incident or Concern* is designed to enable faculty, staff and students to voluntarily report “red flag behaviors” or examples of misconduct that may raise concerns at NEIU. An incident, in this context, is an event that raises concerns but is not an emergency that warrants immediate intervention. **In the event of an emergency that requires immediate intervention, call x5511 to contact University Police [or (773)442-5511].**

The *Report of Incident or Concern* will provide a mechanism for responding to individual incidents and will reveal patterns of disruptive behavior if they are present. It will also provide compiled data on the nature and frequency of disruptions at NEIU. This report provides a standardized method for recording observations of troublesome behaviors and for alerting staff of potential concerns.

All members of the university community are encouraged to contact the BCT with concerns about distressing, disturbing, or disruptive behavior that they observe. The BCT website (www.neiu.edu/~bct) contains all the information needed to make a report, including an easy to use *Report of Incident or Concern* form, which may be submitted electronically directly to the BCT. E-mailing the BCT at bct@neiu.edu or phoning or e-mailing a member of the team will also provide the information to the team.

In accordance with the NEIU Student Conduct Code, information provided in the *Report of Incident or Concern* form may also be considered in determining appropriate disciplinary action with students.

What Happens after a Report is made?

A report or question to the BCT activates a process of information gathering, assessment and intervention aimed at responding to the situation in a proactive, preventive and caring manner in order to restore a safe and positive learning environment. The information gathering and assessment process will determine the need for intervention and will inform the choice of intervention strategies .

Privacy Concerns

In any situation involving reporting, privacy concerns emerge. Privacy is a high priority of the BCT. Records and proceedings of the BCT are kept confidential and shared only on a "need to know" basis in a manner that is consistent with FERPA and University policy and procedures. While every effort will be made to protect privacy of both the reporting individual and person of concern, situations that potentially involve danger or harm require that action be taken to protect those at risk.

Individuals are allowed to make anonymous reports; however, if a name is not provided, it may hamper the team's ability to seek follow up information that may be critical in determining an appropriate course of action. If a name is provided the team will provide feedback regarding actions taken.

For a more complete explanation of FERPA considerations and the BCT, see Appendix D.

Behavioral Concerns Team Protocol

Information Gathering

Once a report has been received by the BCT, the team will implement the information gathering and assessment process. Intervention strategies will be considered based upon: the information gathered and assessment, the needs of the situation, prior incidents/information, seriousness of the incident, etc. The most appropriate time to involve the reported individual in the process will be considered on a case-by-case basis.

In general, the BCT will gather preliminary information regarding the reported behavior. Information gleaned in this initial process will be helpful in determining appropriate intervention strategies. If indicated, a team member(s) will interview the reported individual as part of the initial assessment process. The interview will provide the opportunity for the reported person to share his/her concerns about the situation and gain assistance in resolving the situation.

This process may include any of the following data gathering processes:

- Interviews with all available parties with information about the situation
- Interviews with the person alleged to have displayed inappropriate/concerning behavior
- Assessment by counselor/mental health professional
- Interview with any identified potential targets of inappropriate/concerning behavior
- Contacting an individual's family members
- Review of student's academic and disciplinary history
- Legal/criminal background check

Assessment Process

Assessment assists in early identification of situations that may pose a threat to others, creates a baseline of information against which to assess future behavior, and provides a means for implementing interventions to increase the likelihood of a positive and safe resolution. While there is no single set of warning signs that will reliably predict behavior or campus violence, the assessment process looks for behavioral evidence that an individual may be planning or preparing to act out inappropriately or carry out some type of threat to self or others.

Assessment is also designed to evaluate risk in order to ensure the safety of the individual of concern and any others potentially involved. In addition, concerning behaviors that appear to have low risk may nonetheless be distressing and disruptive to either the person of concern or to others. The assessment process is aimed as well at resolving concerns that initiated the inappropriate behavior and at linking the person of concern with needed resources.

Levels of Risk

Based on all data gathered, the Behavioral Concerns Team will utilize the following scale to determine the level of risk that the behavior/situation poses to the student and to others. The BCT will also utilize Threat Assessment scales created by NCHERM and the Center for Aggression Management.

Low risk – There is little or no serious threat to the reported individual or to others. At this level, any concerns can generally be resolved by addressing the situation or the conflict between the parties involved. Counseling and follow-up support may be recommended. Generally, in this situation, the individual can acknowledge the inappropriateness of the behavior and engage in resolving the situation with other(s). These individuals may be experiencing distress, but their conduct is not generally in violation NEIU's Student Conduct Code — no threat has been made and the individual is cooperative in de-escalating the situation.

Moderate risk - At this level, there may be more involved or repeated disruption. There may be a vague or indirect threat to self or others that could be carried out although there is no evidence that the individual has taken preparatory steps. Further assessment of threat will be required. At this level, students will be referred to the student judicial process if behavior is in violation of the Conduct Code.

High risk – At this level, there appears to be an imminent and serious danger to the safety of the individual of concern or to others or to property. At this level, University Police will be involved. When the behavior or situation is caused by a student, the Dean of Students Office will be notified. **As in any emergency, contact University Police immediately.** Other administrative measures such as Immediate Temporary Suspension or Involuntary Administrative Withdrawal of a Student may be enforced.

Intervention Strategies

Based on the behavior displayed by the individual and the assessment by the Behavioral Concerns Team, the BCT may make any of the following recommendations for intervention. Recommendations are made in consultation with the appropriate university department or administrator who takes any final action.

Mediation/Guidance — For behaviors that do not violate the University Student Conduct Code, the BCT and/or the Dean of Students may intervene to provide guidance, support and mediation of disputes, and resolve situations and prevent escalation.

Referral to University and/or Community Resources — The BCT may refer an individual to the Counseling Office for services and connection with appropriate university and community resources.

Voluntary Withdrawal from Classes — Based on discussion with a counselor or member of the BCT, a student may choose to temporarily take time away from the university to deal with other concerns. The student may re-enter the university during any future semester, in accordance with NEIU policy.

Referral to Disciplinary Process — The BCT will make this referral to the Dean of Students Office when it is determined that student behavior may be in violation of the University Student Conduct Code.

Immediate Temporary Suspension — The BCT may recommend to the Dean of Students that students determined to be at high risk for danger to self or others be temporarily barred from the university based on imminent safety concerns. The procedures for Immediate Temporary Suspension are outlined by University policies and procedures. Other measures may be imposed as needed.

Involuntary Administrative Withdrawal of Students—The BCT may recommend to the Dean of Students that students determined to be at high risk for danger to self or others be required to participate in a mandatory assessment by a mental health consultant acceptable to the university (at no cost to the student). The mental health consultant will conduct an assessment of direct threat, provide assistance in gaining access to emergency care for the student as needed, assist the student in establishing ongoing treatment as needed, and provide feedback and recommendations to the BCT.

In extremely high risk situations, the BCT may find it necessary to recommend to the Dean of Students an Involuntary Withdrawal for a dangerous student who will not comply with the requests of the BCT or agree to a voluntary withdrawal. Involuntary Withdrawals will be determined based on the opinion of the mental health consultant that the student poses an imminent risk of serious harm to self or others. The length of withdrawal and conditions for re-enrollment at the college will be determined by the Dean of Students at the time that the withdrawal is imposed.

Criminal Charges — Individuals who have engaged in behavior that may be in violation of local, state, or federal law may be referred for criminal prosecution. University Police will ensure that a comprehensive investigation is conducted and determine whether probable cause exists for the filing of criminal charges.

Follow-Up and Monitoring — In addition to any of the specific intervention strategies described previously, the BCT will determine a plan for follow-up monitoring of concerning behavior. This may include checking with faculty and staff regarding student behavior and periodic meetings between the individual and a BCT member.

Feedback to Referring Individual

The BCT may provide feedback to the referring individual to inform them of resolution of the case and any ongoing follow-up in which they may need to be involved. All feedback regarding students will be in accordance with FERPA guidelines.

Record Keeping

All records of the Behavioral Concerns Team will be stored in a confidential database.

Appendix A — Responding to Student Misconduct: Guidelines for Faculty and Staff

NEIU recognizes the important role faculty members have in setting the educational tone of their classrooms. Setting clear guidelines for behavior and following clear protocols for classroom disruption can go a long way toward ensuring a safe and productive learning environment. In addition, the Behavioral Concerns Team (BCT) is a resource for dealing with concerning or problematic behavior.

Tips for Preventing Misconduct in the Classroom

- Set clear standards for behavior in your classroom. Just as faculty members determine academic standards and evaluate student performance according to those standards, it is recommended that faculty members determine and clearly communicate social conduct standards for their classroom (no chatting in class, reading newspapers, sleeping, using cell phones, etc). For courses with online components, it is recommended that expectations regarding electronic communications be included.
- Provide specific information in the syllabus regarding your classroom expectations in addition to a reference to the Student Conduct Code.
- Taking these steps not only sends a message to potentially disruptive students but also communicates to all other students that you will ensure a classroom environment free from disruption.

Recommendations for Responding to Misconduct in the Classroom

Please note that progression through these steps depends upon the level and repetition of misconduct. Ideally, most incidents of misconduct will be remedied at Step 1 or Step 2.

Step 1:

- Provide an oral warning to student at the time that inappropriate behavior occurs.
- Consider reminding the entire class regarding your expectations

Step 2:

- Talk to the student individually after class or ask him or her to schedule a meeting with you. If you are not able to talk with the student individually prior to the next class period, you may contact the student by phone, e-mail, or letter.
- During the discussion with the student, clarify your expectations for classroom conduct and seek the student's cooperation in meeting those expectations. Indicate that further incidents may result in the student being asked to leave class and that if such response is necessary, a report will also be submitted to the Dean of Students Office for further disciplinary action.
- DOCUMENT all information relevant to the student's misconduct.
- You may wish to file a *Report of Incident or Concern* if the behavior raises "red flags" beyond ordinary classroom disruptions.

NOTE: Step 1 and 2 may both occur during a single class period if a student fails to correct the behavior after being warned by the instructor.

If the oral warning does not remedy the situation and the inappropriate behavior continues:

Step 3:

- If the behavior persists beyond the oral warning or is so disruptive that immediate action is necessary, ask the student to leave the class for the remainder of the class period. If the student refuses to leave the class, call **University Police (x5511)**. If necessary, temporarily adjourn the class and ask another student to call University Police.
- If continued exclusion from the class is deemed necessary by the instructor, a conference between the instructor, Department Chair, and student must be held as soon as possible to determine if further action is warranted. DOCUMENT all relevant information.
- Provide a copy of the documentation to the Department Chair and to the BCT.
- File a *Report of Incident or Concern* with the BCT: www.neiu.edu/~bct

Step 4:

- Upon receipt of the *Report of Incident or Concern*, the BCT will investigate the incident and make recommendations.
- In addition to review by the Behavioral Concerns Team, the investigation may include meetings with the student, faculty member, and Department Chair. The faculty member and Department Chair will be informed of the results of the investigation.
- If disciplinary action is to be taken, a student has the right to a formal hearing on the charges and actions.

Meeting with an Angry or Potentially Threatening Student

Do not meet alone with a student whom you feel may be a threat to your personal safety. Instead of asking to meet after class, schedule a specific appointment so that you have time to prepare for the meeting. You may call a member of the Behavioral Concerns Team for consultation or assistance prior to the meeting.

Alert and confer with your Department Chair and/or colleagues as to when the student will be meeting with you, and ask one of them to either be on standby or to join in the meeting.

A Note on Due Process

To be in compliance with a student's right to due process regarding disciplinary actions, it is important that the university:

1. Provide a warning describing the nature of the misconduct including information on what section of the Conduct Code the student has violated;
2. Provide the student a reasonable opportunity to correct the behavior;

3. Provide a procedure to appeal the assessment of the conduct and any disciplinary actions taken.

Student Conduct Code

- The Student Conduct Code is designed to clarify expectations for student conduct on campus (academic and social).
- Faculty and staff should be aware of the Student Conduct Code and feel comfortable referring to it.
- The Code is available in the Student Handbook and online at http://www.neiu.edu/DOCUMENTS/Dean_of_Students%20-%20Docs/uscc.pdf

References:

Armada, G. (1999). *Coping with Misconduct in the Classroom: A Practical Model*. Asheville, NC: College Administration Publications.

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Virginia Tech (2006). *Responding to Disruptive or Threatening Student Behavior: A Guide for Faculty*. Blacksburg, VA: Virginia Tech. Available online at <http://www.dos.vt.edu/documents/DisruptiveStudents-faculty.pdf>

Appendix B — Responding to Students in Distress: Guidelines for Faculty and Staff

As NEIU is a non-residential university, faculty and staff play an especially important role in being aware of and responsive to students who may be struggling. You have an important relationship with each of your students: this relationship can be a powerful vehicle that you can use to encourage someone to seek help. At the same time, without mental health training, many may feel unprepared to address signs of distress or problematic behavior in their students. The following is intended to provide helpful guidelines for dealing with such situations. In addition, the Behavioral Concerns Team welcomes your questions on any issues regarding behavior that concerns you.

Students in Distress

All of us experience a “bad day” now and then, and usually it is only a short time to recovering a more positive attitude and the ability to cope with whatever situation has presented itself. Sometimes, however, the bad day persists and we begin to see signs of ongoing distress and poor coping. These signs may include:

- Drop in grades or performance, excessive procrastination
- Disappearance from class or regular activities
- Excessive weight gain or loss
- Withdrawal and isolative behavior
- Focus on suicide or harmful behaviors
- Neglect of appearance or hygiene
- Strange or bizarrely inappropriate behavior
- Inappropriate dependency
- Impaired speech or disjointed thoughts
- Unstable mood, including depression, irritability, anxiety, tearfulness

These behaviors may be related to ongoing depression or anxiety and may be due to problems in relationships, past trauma, addictions, eating disorders, grief and loss etc.

In any emergency situation, call University Police at X5511.

What to Do

When you observe behavior that points to ongoing distress, addressing it with the student can go a long way toward supporting and encouraging the person to get the help they need. Don't assume that someone else in the student's life will intervene. You are always welcome to contact the BCT or the Counseling Office about your concerns before you meet with your student.

Communicate your concerns:

- If appropriate, talking with your student in private about what is upsetting to them may make help him or her be comfortable and more open with you.

- Be direct about your concerns, focusing on the student's behavior and your concerns for his or her welfare.
- Listen to the student's concerns while acknowledging the limits on your ability to help. You must also be aware of your own comfort level. Some faculty members might feel very comfortable talking with a student about the loss of a loved one or some other distressing situation. Others panic at the sight of tears and don't know what to do to be helpful. Know your own boundaries and refer to the Counseling Office when necessary.
- Let your student know that additional help is available through Northeastern's Counseling Office (x4650).

Refer to the Counseling Office:

When one of your students shares difficulties that are beyond your ability to help, or when a student's behavior suggests serious emotional problems, it may be best to refer the student to the Counseling Office.

Let your student know that you are concerned about his or her welfare, but that the problem is beyond your field of expertise. Indicate that counseling may help him or her deal with the situation more effectively. Finally, suggest an initial meeting with a counselor to see if it may be useful. You can't force a student to seek help, but your expression of concern can be a powerful influence on your student's choice.

Sometimes simply giving someone a name to call is sufficient; at other times, actually making a call to the Counseling Office while you are meeting with a student is effective. If you aren't sure that the student will follow through, you may want to call and arrange a meeting with a counselor, walking the student down to meet with the counselor for the first time. Your goal is to ensure that the student and the counselor *make contact*. We'll take it from there.

You may walk your student down to the Counseling Office (D-024) at any time during regular business hours, or call (x4650) while your student is with you to encourage them to make an appointment.

Refer to the BCT:

You may feel that talking with and encouraging a distressed student provides the boost that the student needs. You may find that a student is grateful to know about services in the Counseling Office. You may find that the student follows through on your referral and you observe a positive change in him or her.

On the other hand, you may encounter situations that continue to concern you: where students are not responsive to your concern, the behavior persists or escalates, and your own internal "red flags" are raised. In any of these situations, contact the BCT (www.neiu.edu/~bct or bct@neiu.edu). The BCT is here to assist you in these problematic situations or in situations where you are uncertain.

Appendix C — Responding to Concerning Behavior Involving Non-Students on Campus: Guidelines for the University Community

A positive University environment is important for the development and success of students. At times, you may become concerned by the behavior of members of the University community who are not students. These guidelines outline some behaviors that may be “red flags” to emerging situations. If you are concerned about a colleague, a staff member, or someone unknown to you whose behavior has raised concerns, contact the BCT.

These behaviors include:

- Neglect of appearance or hygiene
- Strange or bizarrely inappropriate behavior
- Inappropriate dependency
- Impaired speech or disjointed thoughts
- Unstable mood, including depression, irritability, anxiety, tearfulness
- Behavior(s) which regularly interfere with classroom environment or management
- Notable change in work performance – poor or inconsistent preparation
- Notable change in behavior or appearance
- Impairment of thoughts – verbally or in writing
- Aggressive behaviors toward others; inability to set limits or re-direct focus
- Poor decision making and coping skills
- Inappropriate or strange behavior
- Low frustration tolerance
- Overreaction to circumstances
- Lack of resiliency
- Appearance of being overly nervous, tense or tearful
- Expression of suicidal thoughts or feelings of hopelessness
- Withdrawal and isolation
- Excessive weight gain or loss
- Writings and comments endorsing violence; unusual interest in violence
- Indirect or direct threats in writings or verbalizations
- Lack of empathy and concern for others; inability to care
- Anger management problems
- Threats to others

These behaviors may be related to ongoing depression or anxiety and may be due to problems in relationships, past trauma, addictions, eating disorders, grief and loss etc. The behaviors fall into two general categories: those that signal distress going on in the individual, and those that may be causing distress to others. If you observe distress in a co-worker, you may want to address it with him or her. If you observe behavior that is intimidating or threatening, you might prefer to contact a supervisor or the BCT for help in how to proceed.

As in all emergency or crisis situations, if immediate intervention is needed, contact University Police at x 5511.

What to Do

When you observe behavior that points to ongoing distress, addressing it with the individual can go a long way toward supporting and encouraging the person to get the help they need. Don't assume that someone else in the person's life will intervene. You are always welcome to contact the BCT or the Counseling Office about your concerns before you talk with the individual.

You may also refer the individual to the Counseling Office. For employees, the Counseling Office offers short term services that focus on providing support to the individual and linking them with services in their community. The Counseling Office may also be able to link the individual with other on-campus services.

If the concerning behavior(s) causes distress to others, you may wish to discuss the situation with your supervisor, contact a member of the BCT and/or file a *Report of Incident or Concern*.

Appendix D — Complying with FERPA

FERPA Compliance Information

The Family Education Rights and Privacy Act, otherwise known as FERPA, provides students rights of access to their education records and insures that such records will not be disclosed to others without their prior written consent. Implicit in FERPA is the high value students are entitled to place both on their private education records and also upon their freedom to choose when to make public their own records. FERPA protection, however, is not absolute.

Recently enacted changes to FERPA give University officials greater flexibility in releasing student information in the case of a health and safety emergency. The changes to FERPA clarify disclosures in a health and safety emergency, removing strict construction of this exception, and allowing disclosure if there is an articulable and significant threat to the health or safety of a student or other individual. In health and safety emergencies, FERPA permits sharing of information amongst University officials and with outside entities in order to protect the health or safety of the student or other individuals. Since the BCT is responsible for identifying, responding to, and supporting at risk students, please be advised that health and safety emergencies may require disclosure of student education records to protect the health or safety of the student or other individuals.

Please know that student privacy is a high priority of the BCT. Records and proceedings of the BCT are kept confidential and shared only on a "need to know" basis in a manner that is consistent with FERPA and University policy and procedures. These changes also require the University to record information concerning the circumstance of the emergency and list of State and local educational authorities and Federal officials and agencies that may make further disclosure of the student's education record without consent.

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