RISK MITIGATION THROUGH THE NCHERM BEHAVIORAL INTERVENTION AND THREAT ASSESSMENT MODEL

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Introduction

Gun violence on college campuses seemingly continues unabated in the aftermath of the Virginia Tech massacre despite the best intentions and increased efforts among legislators, law enforcement officials and college administrators to stem the tide of violence. Recent shootings at the University of Memphis and Delaware State, along with the arrests of gunmen on the campuses of the University of Wisconsin-Madison and St. John's University, have reinforced the belief among all constituents involved in campus safety that more needs to be done to ensure the safety of all who live and work in these environments (Dicken, 2007). State and federal lawmakers across the country have reacted with proposed legislation ranging from the establishment of a National Center for Campus Public Safety, implementation of a proposed law to mandate the development and implementation of campus emergency management plans, the rewriting of federal guidelines to allow for exceptions to federal statutes such as HIPAA and FERPA and finally, extending to requirements that criminal background checks (CBCs) be performed on groups ranging from incoming students to new faculty and staff employees (National Association of State Attorneys General Task Force on School and Campus Safety, 2007). These efforts have left college and university administrators scrambling to implement a patchwork of solutions intended to address a dizzying array of recommendations from security experts without a clear roadmap for how this can and should be integrated to prevent another Virginia Tech-like tragedy. This research is intended to provide an overview of the history of campus violence, including a summary of relevant research on campus risk mitigation concluding with a proposal for a comprehensive risk mitigation and management threat intervention model that formalizes the process for threat collection, threat assessment, behavioral

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intervention and training along with suggestions for a formalized protocol of communication, coordination and intervention procedures.

History of Gun Violence on Campus

Despite the very high profile nature of recent shootings such as those that occurred at Virginia Tech in April, 2007, the total number of deaths attributed to gun violence is still relatively low compared to the statistics for the general population. According to the U.S. Department of Education statistics for 2004 (US Department of Education, 2004), there were 71,621 criminal offenses performed on college campuses including over 15 separate murders. By comparison, according to the Federal Bureau of Investigation (FBI), in 2004 there were 16,137 murders in the United States (FBI, 2004. While murders on college campuses may be relatively infrequent, other violence is not. The true extent of campus violence is hard to decipher, though. The findings of a recent report by 27 state attorneys general alleges that many schools and colleges across the country are not accurately or consistently reporting crime and violent incidents that take place on their premises despite the existence of the "Clery Act", a federal law requiring colleges and universities to regularly and accurately report these statistics to the Department of Education and their campuses (NASAG Task Force on School and Campus Safety, 2007).

Despite the proliferation of other types of crime on campus, the sensational nature of gun violence guarantees increased scrutiny and analysis of "what went wrong". In a recent analysis of a report on fatal school shootings in the United States compiled in the aftermath of the Virginia Tech incident, the data suggest, that since 1966 there have been a total of forty-one shootings on school and college campuses resulting in 144 deaths and 231 wounded at the hand of these shooters.[2] Of these forty-one shootings, 12 incidents resulted in the suicide of the shooter and 8 of these 41 incidents involved shootings on college campuses specifically. Since the report was compiled in August 2007, there have been three more school shootings (2 at the college level) resulting in 3 deaths and 6 wounded. The unfortunate reality of all of these incidents is that there is little in each of their backgrounds to link each of these "shooters" to a systematic "profile" of what might have triggered the shooting behavior in the first place. (Gramlich, 2007).

In 2000, the FBI undertook an analysis of eighteen school shootings to try to identify patterns or profiles among the shooters that demonstrated some consistency across the separate events. This report, authored by Mary Ellen O'Toole, PhD, a supervisory special agent with the FBI, argued that there remains no valid quantitative research "that has identified traits and characteristics that can reliably distinguish school shooters from other students" (O'Toole, 2000). O'Toole argues that anyone can author a threat either through a verbal or written warning but that alone cannot determine whether the person initiating that threat has the intention, ability or means to carry out their threat. This assessment instead has to balance both the threat itself

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[2] These shooting do not include shootings resulting from interactions between school protesters and police (reference Kent, OH, Orangeburg, SC and Jackson, MS)

with an assessment of the person making the threat to determine the likelihood of the manifestation of the threat into reality.[3]

Campus Risk Management Practices

Up until the early 1990s, the discussion of risk management practices in university environments was primarily centered on the insurance management practices of these organizations. Despite events such as the shootings at the University of Texas and Cal State Fullerton, campus shootings were seen as isolated, rare events that could not have been prevented by any interventionist efforts by campus administrators. However, beginning with the shooting at the University of Iowa and continuing forward with events at Simon's Rock College of Bard in 1992, at San Diego State in 1996, and culminating with sequential shootings at Appalachian School of Law and the University of Arizona's College of Nursing in 2002, a pervasive belief was developing among parents, students and other university constituents that college environments were attracting too many of the wrong type of individual. As a result, school administrators began to look again at measures designed to try and address the risk posed by individuals by developing procedures to screen certain types of individuals occupying "security sensitive" positions on campuses.

In most cases the "security sensitive" designations covered primarily staff-only positions involving financial and or student-related personal data such social security numbers. The requirement that only "security sensitive" positions undergo a criminal background check ensured, for the most part, that faculty would continue to fall outside the requirements for background checks on most college campuses. All of that began to change in 2003, when a standard background check of a Penn State Professor who had been nominated for a state board position, revealed the fact that he had murdered three individuals 40 years earlier when he was a teenager (Shackner, 2003). This event, combined with other high profile faculty-related criminal activity[4], spurred legislative activity around the country intended to require the implementation of criminal background checks (CBCs) on groups ranging from incoming students to new faculty and staff employees. Lawmakers in Utah (2007), North Dakota (2007), Kentucky (2006), North Carolina (2006) and Arizona (2005) have passed legislation to implement CBCs on all new employees and some student groups (McFarland, 2007). Finally, in response to the Virginia Tech tragedy in April 2007, four states including Maine, Missouri, Virginia and Illinois took steps to ensure that more mental health records be shared with the Federal National Instant Check system (PR Newswire, 2007).

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[3] In an effort to provide educators, law enforcement and mental health experts a way of judging the criticality of these types of threats, O'Toole has offered a four part model that takes into account the following four factors: personality of the student, family dynamics, school dynamics and the student's role in those dynamics and social dynamics along with the nature of the threat itself.

[4] For example, in February 2007, the University of Pennsylvania revisited its hiring practices after a slew of arrests within its faculty ranks. Since 1993, five professors have been charged with offenses ranging from production of child pornography to murder (Boccella, 2007). In January 2006, a student at the University of Massachusetts at Lowell was charged with armed assault with intent to murder after stabbing a professor who had given him a failing grade (Strout, 2006). In June 2006, a professor at Tidewater Community College was charged with hiring someone to kill a colleague who had accused him of sexual harassment (Leubsdorf, 2006). Finally, in December 2006, University of Wisconsin President Kevin Reilly recommended the implementation of background checks on all new hires after an audit found 40 felons on the university's payroll (Foley, 2006).

In a recent 2007 online survey conducted to assess the use and utility of background checks in U.S. college settings, of the 134 total respondents to this question, fully 27.2% conduct criminal background checks (CBCs) on student workers, 86.4% conduct CBCs on staff and 41% conduct CBCs on faculty (Hughes et. al., 2007).

Despite these increased "check them at the door" risk mitigation activities, high profile criminal activity remains a serious threat on college campuses. In October, 2007, in two separate shootings at the University of Memphis and Delaware State University, the alleged shooters were both current students. In September 2007, in a case involving possible national security implications, the United States government arrested two Egyptian nationals who were enrolled as current University of South Florida students and charged them with transporting explosives across state lines and other terrorism-related charges. All three of these cases demonstrate that despite increased efforts to mitigate risk through implementation of background checks, college campuses need to be doing more to address campus safety across all categories of university constituents.

In each of the prior cases, it is likely that universities would not have conducted CBCs on either incoming or existing students unless these students self-disclosed a violation on their application or were seeking employment with the university. In the case of a foreign student applicant, most universities do not utilize any additional background screening procedures other than those imposed by the U.S. State Department and the U.S. Customs and Border Protection Services during the visa application and entry process. The delay between the visa application and a foreign student's arrival on US soil has the potential to lead to a whole host of national security-related issues. These situations suggest that while CBCs are an important and necessary first step to checking individuals "at the door", these practices need to be augmented with additional techniques in an effort to address the need for ongoing risk mitigation practices that have the capability to "check them over time".

In the aftermath of the Virginia Tech shootings, several prominent panels were convened around the country to examine the issue of violence in schools and, in particular, on college campuses and to determine avenues that administrators can take to possibly mitigate future shooting events. In an analysis undertaken at the federal level, senior administration officials from the Departments of Health & Human Services, Education and the Office of Attorney General, suggested that, relative to higher educational environments in particular, the increased violence on college campuses can be attributed to two factors: Treatment outcomes that enable more people with mental illness to attend college and, increased awareness that mental health issues typically present themselves between the ages of 18-22, the range when most people are attending college (Report to the President On Issues Raised by the Virginia Tech Tragedy, 2007). This panel's recommendations included, among others, an increased effort at sharing of information among local, state and federal officials to provide better detection, intervention and response to school shootings, increased educational awareness of the reporting requirements for information regarding mental illness in college-and school-age individuals, modification of existing state and federal laws to allow for easier reporting of information associated with patients under treatment for a mental illness, and expansion of training in the area of behavioral analysis, threat assessments and emergency preparedness for colleges and universities.

In September, 2007, the National Association of Attorneys General Task Force on School and Campus Safety offered up a set of eighteen recommendations ranging from expanded efforts to prevent bullying[5], adjustments to and modifications of federal statutes such as HIPAA and FERPA to disseminate mental health information in times of heightened risk, modification of state laws to allow more information to be uploaded to the National Instant Criminal Background System (NICS), the establishment of increased audit mechanisms to comply with both state and federal criminal reporting requirements and a recommendation, among others, to adopt an anonymous reporting system where students can report threats or dangerous behavior to school and campus administrators.

At the state level, the Virginia Tech Review Panel Report engaged in a review of the events surrounding the Virginia Tech tragedy. Their mission was to identify actions taken, assess the outcomes of these actions and to make recommendations for how to prevent another tragedy like this in the future. The recommendations cover a wide range of areas including university administration, law enforcement, emergency medical services, the state of Virginia's mental health system, victim service, the justice system and university security systems and protocol. Some of the Panel's recommendations include an updated and enhanced emergency response plan, the formation of a threat assessment team, development of new or enhanced campus alert systems and improved training for first responders and police representatives.

Finally, at the school level, Virginia Tech convened a series of three separate panels to review and make recommendations on the three key areas of security infrastructure, communications infrastructure and an interface group (facilitating across campus interaction among separate operational units for the purpose of sharing information). These panels offered up over 70 specific recommendations ranging from deploying systems to provide instant campus-wide alerts, enhanced campus emergency plans, a requirement that all disruptive student behavior be reported to the single point of contact or threat assessment team, a ban on all guns on campus, increased training for public safety and first responder personnel, increased use of background checks for all firearm sales and a concurrent restriction on the sale of firearms to mentally defective individuals and, finally, the formation of a threat assessment team who can be trained to assess and then deal with disruptive student behavior in the future (Hinker, 2007).

At this point in time, it is still far too early to tell if these various measures and recommendations will adequately address the increasing risks that college and university administrators face. These measures do however go beyond the utility of existing criminal background check policies because they finally do account for some degree of consistent, comprehensive and ongoing threat assessment across student populations who, in the past, have been mostly immune from the existing risk mitigation practices, including the criminal background check policies, currently in place on most campuses today. The following section synthesizes many of the disparate recommendations reviewed above into a cohesive model. The

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[5] Bullying has been identified as a possible factor contributing to the "Social Dynamic" element of the four-pronged Assessment Model offered by FBI Supervisory Special Agent Mary Ellen O'Toole in her publication, "The school shooter: A threat assessment perspective". 2000. Retrieved from: www.fbi.gov/publications/school/school2.pdf Retrieved on October 5, 2007. .

CUBIT model is offered to address the issues related to threat identification, threat assessment, behavioral intervention and training needs highlighted by the various task forces.

THE CUBIT: A Comprehensive Behavioral Intervention and Threat Assessment Model

CUBIT is an acronym for College and University Behavioral Intervention Team. Colleges and universities utilize a variety of models to respond to students in distress. From CARE teams to BIT models, higher education has recognized the need for more effective intervention functionality. If the shootings at Virginia Tech in April of 2007 prompt nothing else from other campuses, our hope is that this tragedy will be a catalyst for other campuses to formalize and revise their current behavioral intervention efforts.

While it is conceivable that many models can be effective in addressing the rising tide of student mental health issues and disruptive behavior, the CUBIT model elaborated in this article is a direct response to the Governor's Panel Report on the Virginia Tech shootings and other panel and internal review recommendations that have been made nationally. This model addresses the myriad concerns about students in distress and synthesizes the range of panel recommendations cohesively, while translating some of their ill-fitting outsider's recommendations into the language and capacities of institutions of higher education.

We recognize that not all of the elements of this model will translate to every college campus, and we expect some variation in implementation as you adjust the model to suit the needs, constraints, resources and capacities of your community. Regardless, we offer this model in our idealized conception, as the most far-reaching, comprehensive and engaged model of its kind.

What sets this model apart from common intervention models can be succinctly summarized in four key elements:

1. CUBIT incorporates a formalized protocol of explicit engagement techniques and strategies;
2. CUBIT is undergirded by sophisticated threat assessment capacity, beyond what typical colleges currently possess;
3. CUBIT facilitates a comprehensive reporting culture within the institution, supported by accessible data collection software with integrated threat assessment tools;
4. CUBIT intentionally integrates with campus and community resources such as crisis management plans, emergency response procedures, CISDT protocols, and existing campus risk management programs addressing sex offenders, criminal background checks and admissions screenings.

Virginia Tech Panel Recommendations

IV-4 :
"Incidents of aberrant, dangerous, or threatening behavior must be documented and reported immediately to a college's threat assessment group, and must be acted upon in a prompt and

effective manner to protect the safety of the campus community" (Report of the Virginia Tech
Review Panel, 2007).

Easy for them to say. Harder for us to do. Here is our roadmap. Each of the bullet
points below is an element we have identified of CUBIT functionality. Each bullet identifies the
goal, and explains how to implement it.

CUBIT Model Goals

- *Establishing a Behavioral Intervention Team composed of key administrators.*

At present, efforts on many campuses to support and respond to students with mental health
needs or other crises are ad hoc or compartmentalized. By, ad hoc, we mean that a key team may
convene as crises arise. This is inherently reactive. By contrast, CUBIT envisions a team
permanently constituted, that meets on a regular basis, and has as part of its function the tracking
of "red flags"[6] long before a crisis arises. Who should serve on this team? It will differ from
campus to campus, but we recommend a student affairs administrator chair the team, and we
prefer that administrator to be someone who has authority within or over student conduct. Often,
students who should be referred for conduct violations by those who witness them are not
referred.[7] Within a CUBIT, behaviors that should be referred will come to the attention of the
CUBIT, and may then be acted upon by the conduct office at the behest of the CUBIT, even if
not referred formally for conduct action by the witness, victim or complainant.[8]

In addition to a student affairs administrator, we recommend a psychologist from the campus
counseling center (if not the Director) as a permanent member of the CUBIT. Beyond these two
key personnel, each campus will determine who additional members should be. Some campuses
have a permanent representative from campus law enforcement, though law enforcement
intervention is not needed in a majority of CUBIT cases. Others need a representative from
Health Services, the Director of Housing/Residence Life, the Office of Public Information, or
someone like the Special Assistant to the President, who often coordinates crisis management
efforts. Don't bloat the CUBIT staff. Keep it lean, agile and easy to assemble. A team of 3-5
members is sufficient. You can "deputize" others as needed, on a case-by-case basis. The BIT

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[6] Red flags are warning signals raised by student or staff behaviors that come to the attention of members of the
campus community.

[7] For example, it was alleged in the Virginia Tech Panel Report that Cho took pictures under his desk of female
students, using a camera phone. His professor did not refer this behavior for conduct action. But, a CUBIT,
receiving information about this behavior as a red flag, would know to act upon it, and follow-up with a conduct
complaint.

[8] This will require your conduct officer to have the authority to initiate conduct action without a formal complaint
from a reporter of the incident/behavior. Your conduct office should have that authority already, but if it does not,
implementing the CUBIT should also include embracing this function. Its importance can be seen in the multiple
allegations of harassment—the media called the incidents stalking—by Cho of members of the VT community. In
at least two instances, the complaining students decided not to pursue conduct action. Perhaps action might have
been pursued by the conduct office irrespective of the willingness of the alleged victims? After all, VT could have
connected the dots that there were two allegations involving the same perpetrator within two weeks. His alleged
victims did not have this information and could not have been expected to see the pattern. A functioning CUBIT is
designed to detect such patterns and act upon them.

at the University of South Carolina can call on staff from the disability services program as needed. The CARE team at Virginia Tech often consults with the Women's Center for needed expertise. A wider circle of administrators and community resources should be reachable, but need not form the core of CUBIT membership.

When we say that traditional efforts can be compartmentalized, we can express what we mean with an example. The University of Illinois, Urbana-Champaign has a suicide intervention model that has been widely touted for its success. Yet, suicidal students represent only one facet of the continuum of students in need. UIC relies on recognizing student suicidality, and then responding. CUBIT, functioning at its best, may bring to light lesser disruptive or distressed behaviors that may allow support and/or intervention earlier, before the crisis of suicidal threats would enable a UIC-style response. We are not critiquing that model. In fact, its underlying reliance on mandated assessment is also a key element of CUBIT. We see CUBIT as building upon that model, and others, with broader scope and reach. For example, some have speculated that mandating assessment of potentially suicidal students might drive those who are truly suicidal underground, for fear of early detection. CUBIT anticipates this effect, to the extent it may be happening, and empowers earlier detection potential by those not looking for signs of suicide. Put another way, if your model is set up only to identify signs of suicidality, it may be looking for the wrong clues. But, CUBIT may pick up such clues from the monitoring of alcohol transports or excessive class absenteeism—for example—that other models might miss.

It is appropriate to note here in more than a parenthetical way that we do not expect that administrators acting on our recommendations will use them to create a level of Big Brother vigilance on campus that seeks to obtain information on red flags at the cost of the privacy of individual members of the community. Nothing in this model suggests security cameras, facial recognition software, or key card readers for accessing every campus building 24-7. College campuses are traditionally open, accessible communities. We hope that will not change. Locking out the threat is a false flag. The threat is usually from within. A security apparatus enabling colleges to monitor a bank of hundreds of security cameras for constant vigilance may sound appealing to some, but it is not the right solution. It would fundamentally alter the nature of the college experience, mostly for the worse. It would put civil rights at risk, and transform an open environment into a police state. Spend the money to form and train a CUBIT.

We do not intend the CUBIT model as license to stigmatize mental health issues and mental illness on college campuses. CUBIT is intended as much for early support as for early intervention. Campuses with functioning behavioral intervention models often find, for example, increases of referrals of students with disabilities. As a result, students receive needed accommodations that they may not have realized they needed, or were available. From there, enhanced coping with the stresses and pressures of academic life can lead to a story of student success rather than a downward spiral.

CUBIT is not intended to enable profiling, which is the use of guesswork about a person's characteristics to expose them to enhanced scrutiny and suspicion. While research indicates that mental illness correlates to a slightly higher risk for perpetration of violence, that link may be explained by other factors and does not in itself justify a conclusion linking increased violence and mental illness. Instead, CUBIT intends to empower skilled threat assessment, which is the

addressing of risks based upon the observation of measurable objective criteria. And, CUBIT expands on mostly reactive threat assessment capacity with an even more proactive element – aggression management™[9]. Aggression management involves getting out ahead of violence with a proven system that can be taught, easily understood and implemented by key constituents on college and university campuses. More on this aspect of CUBIT is detailed below.

- *Formulating a written protocol (specific and comprehensive) for operation of the Team and its inter-relation with campus and community resources*

Some campus protocols can be breathtakingly brief. A one-page example of a crisis management protocol used by one campus could accurately be summarized as having one instruction: call the police. Other protocols can be mind-numbing in their detail, going on for pages that no one ever reads or consults[10]. The key to an effective protocol is to structure a set of instructions that is long enough to be specific and short enough to be approachable and useable. Elements of an appropriately detailed CUBIT protocol include[11]:

- ❖ How members of the CUBIT are to be contacted in an emergency
- ❖ A default meeting location for convening CUBIT emergency sessions
- ❖ How often the CUBIT will meet in regular (non-emergency) sessions
- ❖ Who the Chair of the CUBIT is and how long they will serve in that position
- ❖ Who will fill-in as Chair in the absence of the regular Chair
- ❖ Who will serve as the CUBIT community liaison
- ❖ Duty roster of who is on-call, with one member of CUBIT on-call at all times
- ❖ Clear instructions to all employees on how to reach the CUBIT on-call staff
- ❖ Detailed criteria for how the Chair activates campus warning systems (text, email, sirens, etc). We recommend strongly that the Chair have this authority, even if it is shared
  - Coordination with Clery Act timely warning requirements
- ❖ Detailed instructions for the role of the Chair when campus emergency management protocols are activated (CUBIT should take a back seat to crisis response at that time)
- ❖ Detailed criteria by which CUBIT may impose interim suspension and/or trespass and/or persona non grata orders
- ❖ Liaison procedures with the office of student conduct for purposes of imposing campus-based no-contact orders
- ❖ Liaison procedures whereby campus hearing outcomes for acts of violence, disruption, threats and other pertinent offenses will be shared by the office of student conduct with the CUBIT
- ❖ Liaison procedures for coordinating with community agencies and resources
- ❖ Clear jurisdiction on whether CUBIT coordinates just student intervention efforts, or faculty/staff/administrator efforts as well

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[9] Aggression Management is a trademark of Aggression Management Solutions, Inc. It is used with permission.
[10] No one wants to be caught, as the University of Washington was in the 2007 death of employee Rebecca Griego, with a moribund stalking protocol that was not activated when Griego reported threats from an ex-lover who subsequently killed Griego and himself on campus.
[11] This list is obviously not a protocol itself, but a list of things that a comprehensive protocol should address. For assistance with developing such a protocol for your campus, or for access to the NCHERM Model CUBIT Protocol, please visit www.ncherm.org.

- ❖ The correct reporting protocol for incidents or red flags to be reported to CUBIT, and authority to redress non-reporting by employees who fail to follow policy
  - ▪ Including how quickly red flags are to be fed into the database by employees
  - ▪ How much detail should be included
  - ▪ Privacy boundaries for reporting personally identifiable information or information from privileged sources
  - ▪ A risk or alert scale by which the reporter can escalate the level of criticality of the report, with the highest levels requiring not just uploading to the database, but a call to the on-call CUBIT member as well
  - ▪ We recommend a five-level scale as follows: mild risk, moderate risk, elevated risk, severe risk, extreme risk, with each category clearly defined
- ❖ If CUBIT operates in concert with a database, the protocol should specify how often red flags are culled and assessed by the on-call CUBIT member
- ❖ The feedback loop by which CUBIT can confirm to reporting employees that red flags are being acted upon
- ❖ Notification to CUBIT of all behavioral contracts formed between college officials and students (and a policy governing how such documents are to be used).
- ❖ Notification procedures for contacting parents, guardians, roommates, friends, faculty, coaches, etc. Part of this protocol should be an assessment of whether such notifications are legally permitted, and whether such notifications could be helpful or harmful to the intervention and helpful or harmful to risk management priorities.
- ❖ Process and criteria by which CUBIT coordinates with the office of student conduct and/or law enforcement to determine if reports should be pursued despite having an unwilling complainant, anonymous report or reluctant witness
  - ▪ Assessment in suicide threats/ideation/attempts of whether involving parents would exacerbate situation. Determine who has custody/guardianship/who is emergency contact. Often, friends/roommates will have insight into the relationship of the subject with their parents.
- ❖ Notification criteria for elevating reporting beyond CUBIT to vice presidents, president, campus law enforcement, local law enforcement, FBI, Homeland Security, etc.
  - ▪ Who calls whom, at what number – phone chain clearly established
- ❖ Criteria for determining when CUBIT members can/should/must meet with the subject
- ❖ Coordination with local ambulance, hospital, mental health, advocacy and other resources
- ❖ Coordination with academic support services on absenteeism
- ❖ Requirement that faculty report classroom (and other student) disruption incidents to the database, and potentially to the office of student conduct
- ❖ Requirement that residence life personnel report residence hall disruptive behaviors to the database, and potentially to the office of student conduct if they reach a threshold of severity
- ❖ Requirement that campus law enforcement coordinate police log entry with CUBIT database entry requirements
- ❖ Criteria for mandating psychological assessment for a student
  - ▪ On campus?
  - ▪ Off-campus?
  - ▪ Social worker, Psychologist, or Psychiatrist
  - ▪ How soon?

- How will results be communicated to CUBIT?
- What will happen if student fails to complete assessment in time?
❖ Procedure for enabling continuity of therapeutic care for a student who leaves campus voluntarily or involuntarily under this protocol, when that student is treating with campus mental health resources at the time
❖ Procedure for voluntary/involuntary medical withdrawal
- Is the student qualified as a person with a disability?
- Direct threat determination procedures under Section 504
- Accommodations under ADA
- Conditions for return
❖ Procedure for responding to a student who returns from the emergency room or community in-patient mental health facility following a potentially suicidal situation
❖ Procedure for custodial holding of student while interim suspension is being determined, or when interim suspension is imposed, but a gap in transition is in place until the student relocates, parents arrive, etc.
- Detail on how quickly a student must vacate campus,
- Notice to roommates, faculty, staff
- Rekeying locks
❖ Procedure for college or university personnel on responding to hospitalization
- Who will go?
- Transport for student to return
❖ Management of student health plan, medical insurance, referral and other point-of-treatment issues
❖ Management of custody of a student who may be an imminent threat of harm
❖ Assessment of threats
- Aggression Management assessment
- Primal or cognitive aggressor?
- Assignment of level on Byrnes' 9-level scale
- Written findings of objective criteria
- Assessment of legal "true threat" and free speech issues, if a public university (for evaluation of student writings and statements)
- Assurance of due process if public university
❖ Comprehensive response to threats
❖ Mechanism for "minding the gaps," monitoring periods where a student in distress goes dormant, with criteria for determining whether such quietude raises increased or decreased monitoring needs
❖ Instructions to follow in the event of student death
- Notifications
- CISDT integration
- Handling delicate release of information if death by suicide

- *Coordinating Team operation with current crisis response protocols, campus CISDT models and ERP/EOC procedures*

On many campuses, emergency responses and crisis response protocols have been developed and tested. There are Emergency Response Protocols (ERPs), Emergency Operation Command

(EOC) procedures, Critical Incident Stress Debriefing Teams (CISDT) and other models. As you add CUBIT functionality, it is important to integrate existing or concurrently created protocols to ensure parallel functionality, cooperation, information sharing, liaison, and jurisdictional clarity. We don't need turf battles over who gets to help, when, and where. CUBIT members need to know about each of these protocols, who governs them, and how to activate them, if needed. Each of these protocols needs to reference how and when to contact the CUBIT Chair. Just recently, a student threatening to jump from a building was talked down based on information that the campus intervention team was able to share with the rescue team about the background of the student who was threatening suicide, creating a very effective collaboration.

- *Integrating CUBIT with existing research, evolving campus criminal background check procedures, conduct hearing procedures and collection of student felony information and sex offender data at the point of university admissions and thereafter*

In 2001, a study by David Lisak, Ph.D., at the University of Massachusetts, Boston revealed that 120 male students--of a surveyed population of 1,882--were responsible for 483 total acts of sexual violence (Lisak & Miller, 2002). 76 of those 120 men were responsible for 439 of the acts of sexual aggression and 1,045 total acts of physical violence. 76 men. 1,000 crimes. 14 acts each. And, Lisak's measures used very conservative definitions of crimes. Without commenting on additional but less frequent crimes by women, research like Lisak's and that of Antonia Abbey at Wayne State University suggests that campuses are not beset with criminals. We suffer, as does society, from the repeated acts of a small group who will perpetrate over and over until police interdict them. Lisak's results indicate that those who commit violence are 63% more likely to be repeat offenders than to be one-time offenders. Abbey's research suggests that roughly half of those admitting to violence were repeat offenders and half were one-time offenders (Abbey & McAuslan, 2004). Both studies insist we show skepticism to the assumption that incidents of violence are isolated, that offenders are unlikely to recidivate, or are unlikely to have acted violently before. They are at least as likely as not to be repeat offenders.

The implications of this research need to be applied by CUBIT to campus conduct hearings, criminal background check procedures, and admissions decisions with respect to previous crimes and applications by sex offenders. In light of this research we need to challenge why campus committees examining the criminal backgrounds of applicants believe that they have some ability to prognosticate whether a previously violent individual will or will not be a safe member of the campus community as employees? Screening admissions applications of those students who admit to criminal histories via questions on the admissions application is important, but what training would enable anyone to believe that a secondary fitness for candidacy determination will offer a crystal ball into a student's future violent propensities? Why are campus conduct boards and administrators on some campuses so unlikely to suspend or expel students (Bowers, 2007)? When did we confuse the need to make the conduct process educational with the expectation that we can educate violent criminals not to recidivate? What right do we have to play Russian Roulette with future victims within our communities? Zero tolerance for admitting, employing and retaining violent individuals has to be on the table, for purposes of CUBIT functionality. Perhaps the determination need not be automatic, but it is time to end the arrogance of assuming we can distinguish the repeat offender from the one-time

perpetrator based on the report of one incident. Too many campuses are soft on these risks. They offer educational courses for rapists, mediation for violent conflict, anger management for abusive partners. They are willing to hire the sex offender, but believe that limiting contact with students is enough. What right does anyone have to impose their heartfelt belief in redemption on the vulnerable and unsuspecting population of potential targets of a recidivist offender? There is no doubt that not all offenders are repeat offenders. But, until we can tell the difference, the safer assumption is not that violence is isolated, but that it is just the tip of the iceberg.[12] If the goal is protection of the campus community, we have to be willing to reexamine our core beliefs and priorities about redemption, rehabilitation and whether colleges are the right instrumentalities for those purposes.

As part of CUBIT implementation, we also recommend that each campus revisit the idea of collecting better information about student applicants. One of the best methods of such screening is to ask questions on the admission application. Very few states prohibit asking on an admissions application about convictions for violent crimes. They may bar asking about expunged or sealed juvenile records, and your questions can include specific limitations about that. State laws also do not bar asking whether a student has been suspended or expelled from another institution of higher education. Many higher education attorneys have recommended against such questions, unsure that admissions offices will subject such red flags to adequate secondary scrutiny. We shouldn't ask the questions unless we intend to use the answers to influence our character and fitness determinations. If the information will not influence admission decisions, or lead to the placing of certain restrictions on those who raise red flags but are subsequently admitted, it may be better not to know. Our preference is that you ask and act accordingly.

- *Training Team members on critical intervention techniques*

We have recommended that a counselor or the Director of Counseling serve as a permanent member of the CUBIT. In part, we make this recommendation because counselors have expertise in crisis intervention, behavioral intervention, grief counseling and assessment. However, responses from law enforcement, student conduct, health services and other campuses resources may be vital. Thus, a comprehensive set of intervention techniques and training on those techniques is necessary for all CUBIT members. This will ensure that if, for example, the student affairs administrator member of CUBIT is on-call, s/he will be familiar with the responses available from other departments, know the right modalities to bring into play, and will call on those professionals who are needed. Similarly, any other member of the CUBIT on-call will also be familiar enough with the services available from other departments to bring them to bear appropriately. Breaking down the silos of individual bailiwicks creates a comprehensive inter-operability that is a hallmark of successful CUBIT functionality.

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[12] Initial reports in the media in April 2007 of two incidents of stalking by Cho were interpreted as isolated by Virginia Tech authorities. Once the shootings took place, we knew the Panel's investigation would reveal more. A third report of stalking has come to light, as well as a report of the drunken actions of Cho stabbing a carpet repeatedly with a large knife at a campus party. This information was apparently known to his residence life staff. Had someone from residence life uploaded this incident, and the VT police done the same, collecting red flags like these would allow a centrally-operating CUBIT to see the iceberg, and not just its tip.

A note on ADA is needed here. Many students in crisis become so as the result of struggling with disabilities. These disabilities may have been unrecognized in that individual, or the individual may not have sought support or accommodations. Often, reasonable accommodations can take pressure off a student in distress, allowing them to cope successfully with the academic environment. But, information about ADA has been poorly translated and time and again, we hear administrators and academicians fear confronting a student whom they believe is a person with a disability. They incorrectly believe that ADA prohibits them from asking the student if they are disabled, or might need accommodations. ADA does prohibit colleges from requiring a student to disclose a disability in the admission process, but we are aware of nothing in the ADA that would or should stop a caring college official from inquiring as to whether a struggling student has ever considering visiting the disability services office to discuss supports that might allow them to cope better academically.

- *Developing a rubric for classification of student distress into specific levels of criticality, warranting varying levels of escalating intervention and/or support.*

Different campuses use different rubrics. We offer one example of a successful classification system of five ascending categories[13]:

1. Mild risk
2. Moderate risk
3. Elevated risk
4. Severe risk
5. Extreme risk

In this system, the CUBIT on-call member, or the CUBIT in consultation, assigns a level of criticality to a student at the time of intervention. The CUBIT then deploys the intervention techniques and strategies appropriate to that level of the rubric. For example, one intervention strategy is interim suspension. On this rubric, interim suspension is only considered at elevated risk situations, recommended at severe risk situations and mandated for extreme risk situations where it is applicable. In this way, CUBIT members deploy responses in a quality-controlled and consistent way. All elevated risk (level three) cases are evaluated for eligibility for the same set of responses, which differ from the set of eligible interventions in severe risk cases, and so on. Checklists are utilized to ensure that all options are considered.

Where multi-pronged interventions are enlisted, different members of the CUBIT (and the expanded CUBIT, if non-permanent members are brought in for special consultation) are assigned responsibility for carrying out specific functions. The Director of Student Conduct might impose an interim suspension and no-contact order at the same time that law enforcement distributes a picture and timely warning, at the same time that the Women's Center or Advocacy program dispatches a support person to a victim. All of this is coordinated by the CUBIT Chair or on-call member. Each CUBIT member reports back on their progress, and in real time, the

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[13] An alternative three-level rubric is recommended by the FBI in "The School Shooter: A Threat Assessment Perspective" (National Center for the Analysis of Violent Crime, Federal Bureau of Investigation, 2000. Retrieved at http://www.fbi.gov/publications/school/school2.pdf. While helpful, it should be noted this is a violence-directed rubric, and is not intended to be as broadly encompassing of other student distress as is the CUBIT model.

CUBIT chair or on-call member can escalate or de-escalate a case based on feedback from the intervention team in the field. This real-time ability to re-assess is critical. Suppose in responding to the victim--who was classified as an escalated risk at the time of the report of an assault—the advocate on scene learns that the victim is suicidal as a result. Reporting back to the CUBIT, the risk can be escalated to severe or extreme, for deployment of additional resources. An advocate is useful to help a victim, but is not the right resource for responding to a student in a suicidal crisis.

Other utility comes from the rubric. For suicidal students, federal law will shield them from separation from the university unless they are a direct threat of harm to themselves or others. Campuses sometimes jump the gun on direct threat determinations, prematurely excluding students who may be ideating, but are not seriously considering suicide. By using the rubric, you can control the application of a direct threat determination. Only those suicide incidents meeting the highest two of the five categories, severe and extreme, are eligible to be evaluated under the direct threat standard. Coinciding with the protocol, the rubric also forces Team members to ask whether the at-risk student is a person with a disability, and whether various state and federal statutes are applicable. Other cases in the lower categories are not direct threats. Skill in appropriately classifying cases can avoid mistakes like the one made by George Washington University in prematurely expelling student Jordan Nott from housing in 2006 (de Vise, 2006).

- *Establishing clear protocols for faculty and staff on responding to students in distress in academic and residential settings*

The frontlines of any comprehensive behavioral intervention model are represented by three flanks: faculty; student staff and fellow students. On typical campuses, at least 70% of the CUBIT cases will originate from reports to these three groups. Some institutions have committed to developing protocols for every employee to follow regarding students in distress. But, where a college or university implements a protocol, it has a commensurate duty to train employees on its appropriate use and application. For some campuses, training all employees is just too onerous (see the section below for suggestions for online training solutions). Instead, we ought to consider protocols and training aimed at the three groups most likely to be aware of red flags, in addition to what we assume is the standard practice on all campuses of making sure all police, health service staff, counseling and student affairs staff have comprehensive training on responding to students in distress.

We encourage specialized protocols and training for these three groups (faculty, student staff and peers) based upon a three-tiered intervention model. At the first level, the protocol should outline effective techniques for confronting problematic behavior. At the next level, the protocol should call for reporting and referral. At the highest level of problematic behavior, the need is to intervene (or call on others capable of doing so). In part, the level of involvement will be based on the 4-D concept in use at the University of South Carolina, a useful rubric for reminding us that not all classroom disruption is caused by merely disruptive students, but may be caused by students in distress, students who are disturbed, or at the highest level, students who are dysregulated. How faculty and staff respond should, in part, be determined by the level of disruptive behavior, who exhibits it, and how.

While written protocols will greatly assist faculty and student staff, training for peers ought to take a different form. Peer intervention ought to be encouraged as part of an overall campus bystander empowerment effort. At Virginia Tech, when Cho IM'd his roommate that he "might as well kill himself," that roommate took action. He serves as an excellent example of an intervener who chose not to be a bystander. We need more empowered peers like that. While some people are natural interveners, others are naturally more reticent. But, intervention can be taught. Skill-building in successful intervention techniques and strategies can empower peers. And, where it does not, we can and should empower peer reporting through a silent witness or campus anonymous reporting system.

- *To comprehensively train faculty and staff on the protocols for responding to students in distress, likely with an online training module.*

Creating a culture of reporting of red flags, especially within the faculty, can be challenging for many campuses. One successful approach is to integrate faculty reporting requirements within a protocol and training on responding to student disruption of the academic environment, inside and outside the classroom. Many colleges and universities are now formalizing such protocols, but the key will be providing training to the faculty on use and implementation. Some campuses will do live trainings, often by department. Many campuses report disappointing attendance, and this an unacceptable result. Faculty members are employees, and employees have an obligation to receive training on critical employment-related skills and tasks. Failure to ensure that training is comprehensive, when life and death may literally hang in the balance, is a challenge to which we must rise. On some campuses, faculty members balk at being "trained", but are open to "professional development" opportunities. We might need to couch the trainings in different terms, or find ways to collaborate with the office of the provost and other academic administrators to enhance attendance. For some campuses, live trainings are the best practice. For other campuses, especially where faculty members are already accustomed to online training on OSHA standards, sexual harassment and similar topics, we suggest integrating a training module on the student distress protocol. Many campuses are already looking to develop such resources in house.[14]

- *To equip the Team with sufficiently sophisticated means of accurate threat assessment*

First, we must distinguish between a psychological assessment and a threat assessment, which is a broader inquiry. We believe that to maximize the potency of the CUBIT model, the Team must have a sophisticated capacity for independent, objective threat assessment. Part of that assessment may take cognizance of a psychological assessment, but the predictive value of psychological assessments has not been established. In fact, the human factor weighs heavily here. Assessment providers don't want to be sued or to lose their licenses. They may feel divided loyalties between their employers and their clients. Their screening may be brief, and their findings may amount to no more than an educated guess. This is not a critique of counselors so much as it is a caution to administrators not to expect what a therapist cannot give.

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[14] One element we suggest appending to your protocol, with permission, are the excellent written guidelines for "responding to disturbing creative writing" developed by Virginia Tech. These are adaptable to many classroom settings. Retrieved at:
http://www.insidehighered.com/index.php/content/download/175802/2248407/file/DisturbingWriting_8_30_07.doc

We cannot rely on them to do the job of the CUBIT. So, how can we equip our Teams with the capacity for threat assessment? First, we can encourage them to follow guidelines for objective evaluation of threats established by the U.S. Secret Service and the Department of Education (Threat Assessment in Schools, 2002).

To this, we recommend that CUBIT members couple the knowledge base of John Byrnes, and the Center for Aggression Management.[15] John is a leading voice in insisting that we are often looking for the wrong person. Profiling leads us to seek out the red-faced, ready-to-explode adrenaline-driven, primal aggressor. Yet, the truly lethal person--like Seung-Hui Cho at Virginia Tech--was and is cold, detached, determined and capable of adaptive intent, unlike someone in a blind fury. Byrnes' Center for Aggression Management teaches that when a Cognitive (intent-driven) Aggressor is prepared to give up his or her life for a cause, their body loses animation and exhibits a profound disconnection with their own wellbeing. Often, we can identify a variety of indicators like the "thousand-yard stare", yet this person could walk right past most security and law enforcement with impunity if they are looking for someone who fits the primal aggressor stereotype.

The Center for Aggression Management teaches that because there are those who will express their conflict with violence− possibly with a weapon-- it becomes essential for CUBIT to get out in front of conflict if it is to prevent violence. Current methods used to defuse aggression, including conflict resolution and anger management, are not the best tools for CUBIT. Conflict resolution presupposes conflict, eliminating any possibility of prevention. Additionally, since individuals experience and express anger differently, anger management requires sophisticated techniques and time. CUBIT depends on techniques that are more easily and quickly deployed. Through the measures provided by Aggression Management's Primal and Cognitive Aggression Continua (PCAC), CUBIT is able to distinguish between the adrenaline-driven aggressor and the far more lethal intent-driven aggressor. The measures offered through these continua give Team members the most effective corresponding means of defusing the type of aggression that is detected. PCAC offers measurable indicators even prior to conflict, enabling the CUBIT to prevent conflict and the violence that it often engenders.

- *To establish a campus-wide database into which real time incident information will be submitted by all university employees, reviewed daily by the Team for red-flags, and acted upon accordingly.*

Many campuses are implementing databases into which the CUBIT can upload information on student red flags, to track incidents. We are recommending an evolution of that approach, whereby employees can and will upload red flag incident information in real time to the CUBIT database, as the mechanism by which the CUBIT members will be alerted about critical incidents and can track them in a centralized fashion. The ***RiskAware Threat Collection and Analysis[16]*** tool is an internet-based ASP (Active Server Page) solution that uses real-time technology to walk university staff, faculty and students through an online, easy-to-use and (potentially) anonymous incident reporting platform. The process flow for reporting is as follows: A reporter comes to a web page and clicks a link there to bring up the incident form to fill out. The reporter

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[15] www.aggressionmanagement.com
[16] www.riskaware.com

can also submit incidents through an email and voice mail (emailed as an attachment) or internal staff personnel can collect offline reports and enter them into the system through the web link. The reason for accommodating these various channels of information delivery is to ensure that over time, all incidents are aggregated into one centralized database.

Once a new incident has been submitted, the system emails the assignee(s) on the CUBIT team responsible for reviewing all new incidents. A member of the CUBIT Super User Team (or whoever has been assigned to the incident) will review the incident and assign a priority level and (if previously defined) automatically route the incident for assignment to a CUBIT Team investigator for follow-up. If there is not enough information to assign or investigate the incident without more details from the reporter, the CUBIT Super User Team reviewer can put her comments and questions in the Reporter Communications field and then change the Status to 'Waiting for Reporter Response'. This will trigger an email to the reporter, which will run the action: The system sends an email to the reporter asking for more information. In this case, if the reporter replies by email or logs in to update the incident, the assigned CUBIT team member will be notified by email once the reporter has answered the questions from the CUBIT Super User team member. Assuming enough information was provided and this initial review is done, the incident should now be assigned for investigation to the appropriate departmental (or if only going to be handled by CUBIT team members) person(s), who will receive an email notifying them about the new assignment (some Teams will prefer phone or live notification). During the course of the investigation, the investigator may add his/her running comments and notes to the Internal Notes field, which is visible only to staff users with the appropriate permissions. Once the investigator has completed the investigation, s/he may reassign this investigation back to the CUBIT Super User Team Member who originally handled the inquiry. Depending on the nature of the investigation, the investigator may alternatively set the inquiry to "closed". In this case, the reporter, if s/he provided an email address, will receive an email notifying him or her of the status change to the incident.

The system has extensive search and analysis functionality to allow for escalation rules which may be defined to check every X minutes, X hours, or X days for some search condition to be true and then to perform any kind of action on the records that are found. For instance, it might check every day for incidents that have a status of Not Assigned and are more than 2 days old and email someone that they should be assigned. It might also be set to "red flag" every incident with a "John Doe" identified thereby ensuring that emerging threats posed by a single individual across various departmental units are not missed.

- *To engage community resources and communicate university expectations and limitations clearly to community agencies, legal entities and service providers*

In addition to recommending that the CUBIT appoint a community liaison, we envision reaching out to the community to improve CUBIT functionality. Some colleges that have very good relationships with local hospitals receive tips that a student is entering or leaving the hospital. Cultivating such relationships can be valuable, within the bounds of law and privilege.

If your campus counseling center does not accept mandated referrals[17], local agencies, magistrates and community mental health resources need to be aware of that. They often see colleges as caring communities better suited to meeting student needs. Sometimes they face a shortage of funding and beds, and are happy just to have somewhere else to "dump" an overwhelming caseload. It is incumbent upon us to make sure community agencies and the legal establishment understand the limitations and capacities of our campuses, and that we are unwilling and unable to be the default mental health apparatus simply because their system is dysfunctional. Often, such conversations involve politics as much as practicality, but efforts to navigate those waters can bridge systems that are unaccustomed to collaboration, allowing mutual understanding and potentially more effective cooperation. Outreach can also clarify for the CUBIT what standards local law enforcement and the mental health system use for involuntary commitment, as a means of determining whether that option is available for addressing concerns about a student.

- *To empower full and contextual compliance with FERPA, HIPAA and counselor confidentiality.*[18]

FAMILY EDUCATION RIGHTS AND PRIVACY ACT OF 1974 (FERPA)

FERPA, the federal statute that protects the privacy of student educational records, applies to all schools that receive federal funds through an applicable program of the US Department of Education, which includes most institutions of higher education. Schools may disclose the contents of education records only when the student consents, when the disclosure meets a statutory exemption, or when the disclosure concerns directory information, such as name and address, and the student has not opted out.

An institution may disclose a student's education records without his or her consent (1) to school officials determined to have "legitimate educational interests," (2) to officials at another institution "where the student seeks or intends to enroll," (3) "in connection with a health or safety emergency" if "necessary to protect the health or safety of the student or other individuals, (4) in connection with a disciplinary proceeding, and (5) to the parent of a student under 21 if the student violates any federal, state, or local law, or any institutional policy concerning drugs or alcohol. Certain disciplinary records of hearing outcomes and sanctions may also be disclosed to a victim of a crime of violence and must be disclosed to the victim of a sex offense. Release ordered by a lawful subpoena is required, and permissive release may be made based upon a student's status as a dependent for tax purposes. Institutions may release information from a student's educational record to whomever lawfully claims that student as a dependent on their tax return. Institutions must verify dependency, which may persist until age 26.

These exceptions to disclosure provide latitude to universities in situations that may arise involving students with mental health challenges or behavioral concerns. Moreover, because FERPA does not provide a student with a private right of action, universities may opt to risk a

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[17] If you have the infrastructure and staff, altering counseling center policy to accept mandated referrals, for assessment and evaluative purposes, is critical to CUBIT functionality.

[18] Portions of this section have been adapted with permission from seminar materials prepared by Carolyn Reinach Wolf, Esq., an expert on mental health law (www.abramslaw.com).

FERPA inquiry by disclosing information to protect students and other members of the community from death or serious injury. Usually, the Family Policy Compliance Office is deferential to reasonable judgment calls by college officials, using a "good faith" standard. A number of legislative proposals currently before Congress aim to widen the latitude of colleges to construe the FERPA health and safety emergency provision broadly, rather than strictly.

It should also be noted that of great assistance to the cause of behavioral intervention is the fact that FERPA only covers student educational records when they are in a written or recorded medium. What university officials observe or hear through personal knowledge about a student is not protected by FERPA, because it does not meet the definition of an educational record. Moreover, psychiatric treatment records of students over the age of 18, made in connection with providing treatment, which are not available to anyone other than the provider, are not educational records, and are not subject to FERPA. Once shared with administrators, however, the copy kept by administrators is subject to FERPA. More confusing can be the applicability of HIPAA, and its relationship to FERPA.

HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT OF 1996 (HIPAA)

HIPAA is the federal law governing the use and disclosure of private health information, broadly defined as any information, in any format, created or received by a health care provider, health plan, public health authority, employer, life insurer, school or university, or health care clearinghouse, that relates to past, present, or future physical or mental health or condition of an individual, the provision of health care to an individual, or past, present, or future payment for the provision of health care to an individual.

Universities may be subject to HIPAA regulations if they offer health care services in departments, units, or schools whose staff make electronic transactions. Usually, in the context of a university health service, these transactions might include electronic transmission of insurance and billing information. Though an odd interrelation of FERPA and HIPAA, most college health services will not be HIPAA-covered entities, unless they treat (and engage in electronic transactions regarding) staff or community members. If they only treat students, the law treats FERPA as the governing law.

However, student medical records are excluded from the definition of educational records under FERPA, creating the anomalous result that while FERPA is the governing law for the privacy of student health records, those records are not subject to the protections of FERPA. We are left with applicability of the privilege of mental health and health providers, and state statutes to govern release of information from student health records.

SUMMARY

We thought we would conclude with a summary of the objectives of CUBIT. Each of the sections above enables and empowers the accomplishment of the goals below.

- To balance the educational needs of the student and the mission of the university

- To intervene early and provide support and behavioral response to students displaying varying levels of disruptive, disturbed, distressed and/or dysregulated behaviors
- To respond with support first and sanctions as a last resort
- To predict with accurate individualized assessment the potential for violent, homicidal and/or suicidal behaviors while avoiding stigmatizing mental health issues and stereotype-based profiling
- To enable adherence to a formalized protocol of instructions for communication, coordination and intervention
- To balance FERPA, HIPAA and counselor privilege with university need-to-know and emergency communication needs
- To centralize collection and assessment of red flags raised by student behavior and connect the dots of disparate problematic actions involving one student that may be known to various faculty, staff and administrators
- To engage faculty and staff in effective response with respect to disruptive and/or distressed students
- To coordinate follow-up to ensure that services, support and resources are deployed effectively
- To coordinate mandated psychological assessment, conduct actions, disability services, accommodations, hospitalization and/or medical leave/withdrawal, as needed, and eliminate fragmented care

We hope that the recommendations of this article help to give direction and content to your campus efforts at successfully engaging, supporting and intervening with the growing number of campus community members who are exhibiting distress and creating the strong need for coordinated institutional engagement.

****NCHERM will be offering a number of events in 2008 to help you implement or improve your campus behavioral intervention capacity****

April 10th & 11th 2008 – NCHERM Behavioral Intervention & Threat Assessment Institute at Illinois State University in Normal, IL. Details are posted at www.ncherm.org

May 15th & 16th 2008 – NCHERM Behavioral Intervention & Threat Assessment Institute at the University of Texas, San Antonio. Details are posted at www.ncherm.org

We will also be providing a four-part webinar series covering behavioral intervention and threat assessment topics in January-March of 2008.

PART 1 – College & University Behavioral Intervention Team Formation & Operation -- Presenters Brett A. Sokolow, JD, W. Scott Lewis, JD and Pete Liggett, Ph.D. Friday, January 25th, 2008.

PART 2 -- Advanced CUBIT Team Protocol and Integration -- Presenters Brett A. Sokolow, JD and W. Scott Lewis, JD. Friday, February 22nd, 2008.

PART 3 -- Identifying and Responding to Student "Red Flag" Behaviors -- Presenters Brett A. Sokolow, JD, Stephanie Hughes, Ph.D., Rebecca White, Ph.D., and Carolyn Reinach Wolf, Esq. Friday, February 29th, 2008.

PART 4 -- Threat Assessment and Aggression Management Strategies -- Presenters Brett A. Sokolow, JD and John D. Byrnes. Friday, March 14, 2008.

The series will be hosted by MAGNA Publications. Details are posted at www.magnapubs.com

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