

College Procedure: 304.7 – Threat Assessment

Policy Reference: 304 – Campus Safety and Security
Responsible Department: Facilities and Public Safety
Approval Authority: Cabinet
Procedure Owner: Vice President, Facilities and Public Safety
Effective Date: 01/15/2013

Version Number: 3
Legal Counsel Reviewed (yes/no): No
Scope: College-wide

Reason for Procedure

The goal of the Threat Assessment and Management Team is to assist persons in need and prevent individuals from harming themselves or others. The primary focus is to prevent violence rather than solely respond following an incident. The multidisciplinary team interacts and operates on a regular basis and as needed for crisis situations.

The Procedure

Legal Limits

- **Disability Law** – There are critical situations that may raise disability questions for threat assessment teams. In general, the law permits a student to be disciplined for a violation of the student code of conduct regardless of disability status. The team will determine if a modification of usual policy or practice may be implemented.
- **FERPA** – allows the disclosure of information when the student poses a serious threat to self or others and Kirkwood is allowed, in good faith, to disclose educational records or other information. Some records and information are excluded, including records created and maintained by Campus Security for campus security purposes or a health professional acting in a professional capacity.
- **Medical Records Laws** – HIPAA includes an exception permitting disclosure of protected health information if the disclosure is necessary to prevent or lessen a serious or imminent threat to the health or safety of a person or public.

Team Members and Roles

1. Team Leader(s) – (may also include another role or be shared, with exception of Mental Health)
 - Administrative level
 - Level of authority
 - Not limited by medical confidentiality laws (this person is not a mental health professional)
 - Informs other of high-profile situations, as appropriate
 - Designated point of contact for employees, faculty and others
 - Assemble the team to begin the assessment process
 - Helps team stay focused on student conduct
 - Resources for team to function effectively
 - Tracks data
 - Annual report
 - Bench marking

2. Student Development
 - Provides information to team about student's past behavior based on disciplinary proceedings
 - Advocate for the team
 - Designated point of contact for employees, faculty and others
 - Monitors and periodically updates team on policies and procedures

3. Mental Health Professional – (as needed and when available)
 - Assess the level of risk to self and others
 - Skilled at conducting a safety assessment, including culturally sensitive assessments to differentiate between normal expressions of behavior and conduct that indicates
 - potentially dangerous behavior
 - Versed in nuances of assessment for severe psychiatric disorders
 - Understanding of medical confidentiality laws typically including exceptions
 - Should be familiar with both voluntary and involuntary hospitalization proceedings

4. Public Safety

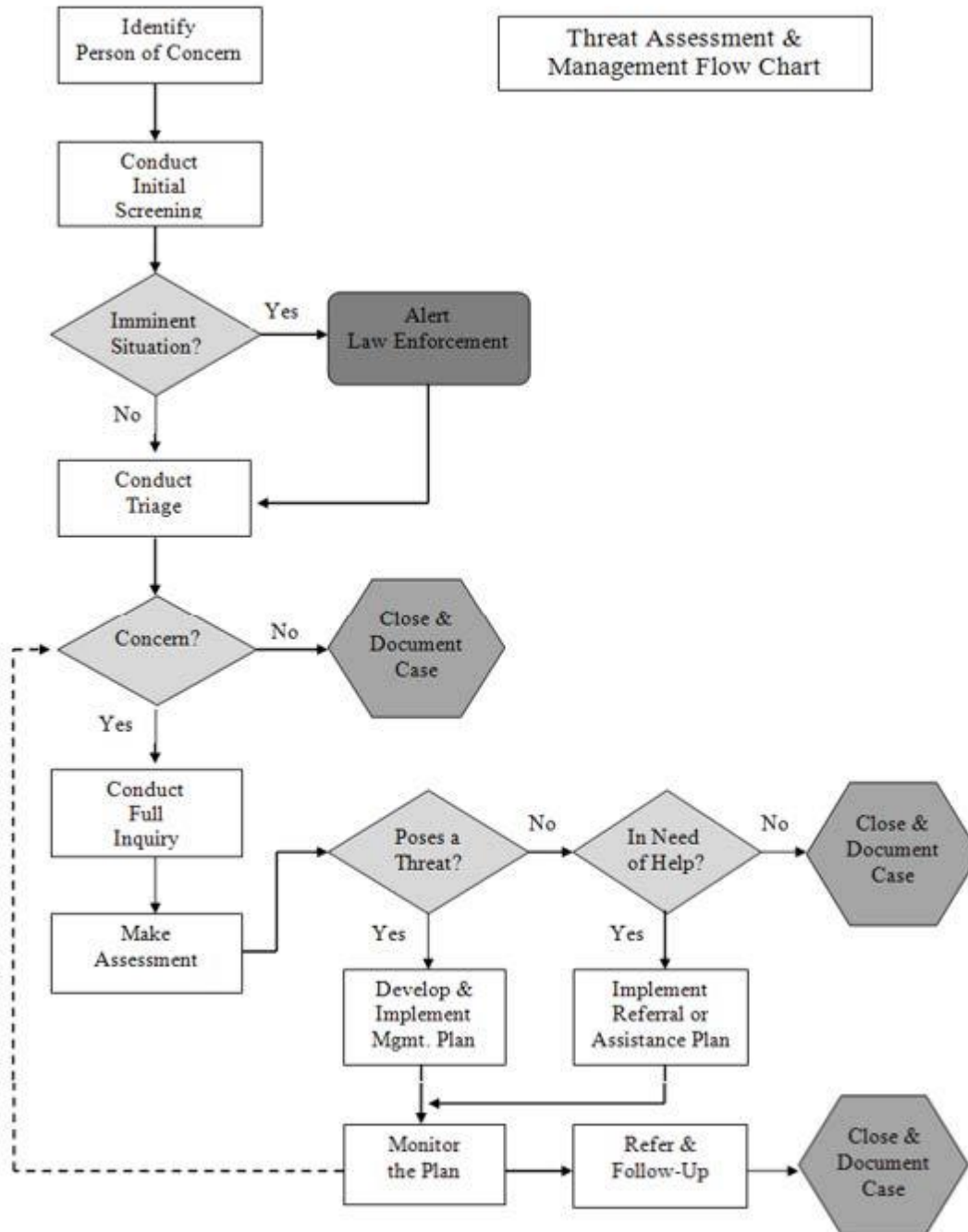
- Coordinates safety and emergency planning
- Background information
- Information on past conduct or legal issues
- Liaison for any law enforcement actions

5. Others – (ad hoc)

- Legal Counsel – advise of legal provisions, have open and easy access
- Disability Specialist – expertise on disability laws, help avoid diagnosed or perceived disability
- Physician or other healthcare provider – possible medical complications that may accompany issues such as eating disorders
- International student representative – if student of concern is a non-US citizen. May be able to provide information about various impact intervention strategies on student's visa status. If student is studying abroad, essential in identifying resources and any complicating issues in the host country.
- Human Resources – for cases involving faculty and staff. Provide access to employee information and records. Responsible for interpreting personnel and contractual issues.
- Marketing and other areas as needed.

Process

The general sequence of steps is provided in the following flow chart. There are several ways to accomplish these steps including the order in which accomplished. They may be handled sequentially or divided among members. Some components may be addressed earlier in the process. As information is gathered, it is fed back to the team.



Revision Log

Table 1 Revision Log

Version Number	Date Approved	Approved by	Description of Change
1	01/15/2013	Tom Kaldenberg, Vice President, Facilities and Security	New Procedure
2	06/05/2018	Cabinet	New template
3	09/17/2019	Cabinet	Procedure template