

Implementing Behavioral Threat Assessment on Campus

A Virginia Tech Demonstration Project

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November 2009

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We dedicate this book to those who lost their lives in the shootings at Virginia Tech on April 16, 2007; to those who were physically injured on that day; to those who suffered psychological trauma and injury as a result of the shootings; and to their families and loved ones.

Foreword

The April 16, 2007, tragedy at Virginia Tech resulted in unprecedented new attention and new practices related to campus safety and security at higher education institutions. At Virginia Tech we have been working on multiple fronts to learn everything we can from the tragedy. Our efforts have been greatly helped through collaborations with experts from around the country who stepped forward to provide advice and assistance. One of our earliest partners was and continues to be the United States Department of Education, Office of Safe and Drug-Free Schools.

With the support of a grant from the U.S. Department of Education, we have developed and implemented several new models for enhancing safety and overall well-being, both for individuals at risk and for the community as a whole. This book provides a detailed summary of two of the major projects we have implemented: (1) comprehensive threat assessment and (2) case management. The case management program represents the provision of supportive services for students and employees and provides systematic follow-up monitoring of individuals who have received treatment. Case managers attend hearings associated with mental health assessments and maintain appropriate communications with relevant parties. Threat assessment is managed by a multi-disciplinary team of administrators, representing the interests of faculty, students, and staff and chaired by the chief of police. The goal of the team is to assess risks as early as possible and minimize the occurrence of emergency situations. The team has the expertise and the authority to intervene when appropriate. The projects supported by the Department of Education have been supplemented and complemented by programs focused on direct support of all victims of the April 16 tragedy. University funds and a major grant from the U.S. Department of Justice, Office for Victims of Crime enabled us to expand counseling services and to develop support programs for the families of April 16 victims, injured students, and members of the university community who were affected by the events.

We hope that the models described here will be helpful to other institutions as they continue to develop their policies and programs.

We continue to assess our efforts and look forward to ongoing national discussions about the best practices to improve safety and security at our universities and colleges. At Virginia Tech we did not plan to become leaders in this area, but we accept the challenge and the opportunity to share our experiences with others.

Mark McNamee
Senior Vice President and Provost
Virginia Polytechnic Institute and State University
Principal Investigator, *Assessing and Responding to At-risk Behaviors in a Higher Education Setting: Virginia Tech Demonstration Project*

November 2009

About the Authors

Marisa R. Randazzo, Ph.D., is a national expert on threat assessment and targeted violence. Formerly the chief research psychologist for the U.S. Secret Service, Dr. Randazzo has provided threat assessment training to more than 10,000 professionals in higher education, secondary schools, corporations, law enforcement agencies, human resources, mental health, and the intelligence community throughout the United States, Canada, and the European Union. In her 10 years with the Secret Service, she supervised the agency's research on presidential threats, insider threats, school shootings, security breaches, and stalking incidents. She also served as co-director of the Safe School Initiative, the largest federal study of school shootings in the United States, and is co-author of the U.S. Secret Service/U.S. Department of Education model of threat assessment for educational institutions. Dr. Randazzo now heads Threat Assessment Resources International, LLC, providing threat assessment training and case consultation to colleges, schools, corporations, and security professionals. She has testified before Congress; briefed Cabinet Secretaries; and been interviewed by numerous major television, radio, and print news outlets about threat assessment and targeted violence prevention. In 2005, Dr. Randazzo was awarded the Williams College Bicentennial Medal for her work in preventing violence. Most recently, she co-authored *The Handbook for Campus Threat Assessment and Management Teams* (Stoneham, Mass.: Applied Risk Management). Dr. Randazzo earned her B.A. from Williams College and her M.A. and Ph.D. in social psychology from Princeton University. Contact: 775/741-3314 or MRR@ThreatResources.com.

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tor of the Women's Center, where she supervised the development of university-wide efforts designed to respond to, prevent, and raise awareness of violence against women. Before joining the Virginia Tech administration, Dr. Plummer worked at Duke University, where she provided support services to survivors of violence and served in several administrative posts. In North Carolina, she also worked with nonprofits, state agencies, and victim rights coalitions on passage of victim rights legislation aimed at supporting victims of rape, sexual assault, and domestic violence. Dr. Plummer teaches in Virginia Tech's higher education program and provides administrative support to university governance and other activities associated with the Office of the Provost. She holds a B.S. degree in human development and family relations and an M.S.W. degree, both from the University of Connecticut. She also holds a doctorate in educational leadership and policy studies from Virginia Tech. Contact: 540/231-6612 or eplummer@vt.edu.

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In our personal lives, we are grateful for the tremendous support and encouragement we received from our loved ones—Robert S. Randazzo and Liz Scharman—and in particular for their patience with us in the face of aggressive deadlines and general project stress. There is no question that we could not have written this book without them.

The demonstration project highlighted in this book would not have succeeded without the dedication of all of the individuals at Virginia Tech who committed themselves to thinking creatively and demanding of themselves and each other the highest level of professionalism. To them we extend our gratitude for their efforts and for sharing their experiences with us for this book.

A very special acknowledgment goes to Associate Assistant Deputy Secretary William Modzeleski of the U.S. Department of Education. We have each had separate opportunities to work with Bill—and even more importantly, to learn from Bill—over the course of our careers. His longstanding commitment to preventing violence and making schools safe led him to reach out to Virginia Tech and make this project possible. We are profoundly grateful for having had the opportunity to work together with Bill on this important project.

Marisa R. Randazzo
Ellen Plummer
Blacksburg, Va.
November 2009

INTRODUCTION

Introduction

Founded in 1872, Virginia Polytechnic Institute and State University (Virginia Tech) is a public land-grant institution located in Southwest Virginia. The university serves the Commonwealth of Virginia, the nation, and the world through its tripartite mission of learning, discovery, and engagement. Virginia Tech is best known for its academic strengths in engineering, architecture, and agriculture but provides educational and research excellence throughout its comprehensive array of programs.

The Virginia Tech shootings occurred on April 16, 2007, a cold and windy Monday. As the end of the semester approached, students and members of the staff and faculty were focused on completing the academic calendar and looking forward to warmer weather. By mid-morning, Virginia Tech had become the site of an unprecedented mass homicide. A student shot and killed 27 students and five faculty members and wounded many more before killing himself. The details of these shootings are beyond the scope of this book but can be found in various public source documents and media accounts.¹

In the weeks and months following the shootings, several extensive reviews and after-action analyses were conducted by Virginia Tech and others to better understand the attack and to try to prevent similar attacks at any institutions of higher education (IHEs). Just as the Columbine High School attack in 1999 served to galvanize efforts toward understanding and preventing K-12 school shootings, so, too, has the 2007 attack at Virginia Tech served to galvanize campus safety efforts and to focus the nation's attention on the issue of preventing campus shootings. In the months following the Virginia Tech shootings, there was much discussion about the threat assessment model developed to prevent K-12 school shootings and its potential utility for higher education settings. Nearly all of the major reports on campus safety issued after the shootings at Virginia Tech advocated for colleges and universities to adapt a version of the K-12 school threat assessment model and

¹ See, for example, Virginia Tech Review Panel report to the governor (August 2007) for a timeline and analysis of the shootings and other aspects of the incident. The full citation appears in Appendix D.

to develop and train campus threat assessment teams² as a key tool in the fight to prevent attacks at IHEs.

The K-12 School Threat Assessment Model

The K-12 school threat assessment model was developed by the U.S. Secret Service and U.S. Department of Education following their research on K-12 school shootings, research that had been prompted by the attack at Columbine High School. Their joint study, known as the *Safe School Initiative (SSI)*, revealed important findings that included the possibility for preventing these mass tragedies. It found that school attacks were typically planned in advance and that the vast majority of school shooters had caused serious concern among friends, associates, family members, and teachers before carrying out their attacks. They also discovered that most school shooters were suicidal prior to their attacks. Some had tried to commit suicide earlier but had failed; others hoped to be killed by law enforcement officers during their attacks; and others were at a point of such desperation that they did not care what happened to them anymore, including incarceration or death.³

In dissecting school attacks that have occurred throughout the United States, the SSI found that school shooters often embark on what researchers call a “pathway to violence”—that is, the shooters first came up with an *idea* to do harm to others, to themselves, or both; then developed a *plan* to carry out their idea; then acquired or secured the *means* to do harm (typically using guns and ammunition, with some school shooters also using knives, pipe bombs, and other destructive means); and finally *implemented* the attack. The key to preventing school shootings, the researchers argued, is to determine whether a student is on a pathway toward violence and, if so, to figure out where

he⁴ is on that path (e.g., he has only developed an idea with no further progression, or he has a detailed plan and has prepared his guns and ammunition).

From these and other findings, experts from the U.S. Secret Service and U.S. Department of Education developed the K-12 school threat assessment model, a model for how to prevent school shootings by learning about a student when he engages in troubling behavior and then gathering more information to determine whether the student is on a pathway toward violence or self-harm.⁵ If the threat assessment team, as the group that gathers and evaluates this information is typically called, believes that the student does pose a threat of harm to himself or to others, the team then develops and implements a plan or strategy to connect the student with resources and assistance that can reduce the threat. Many professionals who work in the field of threat assessment have seen firsthand how the diligent work of school threat assessment teams has prevented school attacks. It is a model that works.

Book Overview

This book documents Virginia Tech’s experience in developing and implementing a behavioral threat assessment process in the time following the campus shootings on April 16, 2007. Starting a campus behavioral threat assessment process included creating a multi-disciplinary threat assessment team; strengthening and developing necessary policies and procedures to enhance and support the team’s efforts; training the team; identifying and harnessing key resources on and off campus to intervene where necessary; securing case management personnel to implement and monitor intervention efforts; and rais-

2 Throughout this book, we use the terms “behavioral threat assessment,” “threat assessment,” and “campus threat assessment” interchangeably.

3 Vossekuil, B. Fein, R., Reddy, M., Borum, R., & Modzeleski, W. (2002). *The final report and findings of the Safe School Initiative: Implications for the prevention of school attacks in the United States*. Washington, D.C.: U.S. Department of Education and U.S. Secret Service.

4 For the purposes of this book, the authors have chosen to use the male pronoun in referring to past school shooters. It is important to note that both genders—male and female—have engaged in school shootings or have plotted school attacks that were thwarted before the implementation phase. But because more boys and men typically engage in targeted attacks or plots than do girls or women, the authors use male pronouns to describe those known to have attacked or plotted attacks.

5 Fein, R., Vossekuil, B., Pollack, W., Borum, R., Modzeleski, W., & Reddy, M. (2002). *Threat assessment in schools: A guide to managing threatening situations and creating safe school climates*. Washington, D.C.: U.S. Department of Education and U.S. Secret Service.

ing awareness on campus regarding the team's existence, its purpose, and the role that everyone on campus shares in reporting troubling behavior to the team.

The information herein was compiled primarily through interviews with Virginia Tech leaders and with individuals appointed as Threat Assessment Team members. It was also derived from threat assessment records and observations of meetings of the Virginia Tech Threat Assessment Team and also the university's Care Team. Finally, some information came from public sources, such as the Virginia Governor's Review Panel, which conducted an extensive analysis of the April 16, 2007, shootings. Where information was derived from publicly available sources, those sources are cited in footnotes and listed in the resource section in Appendix D. The list of those interviewed appears in Appendix C.

The book is organized into chapters that document distinct aspects of Virginia Tech's experience in building a threat assessment capacity on campus. Chapter One outlines the genesis of the demonstration project and details its various aspects. Chapter Two summarizes discussions and critical decision points related to establishing a threat assessment capacity at Virginia Tech. Chapter Three highlights the work done to support and enhance the Threat Assessment Team's efforts. Chapter Four addresses the implementation and development of case management functions related to reducing threats and connecting persons in crisis with necessary resources. Chapter Five discusses the concerns unique to implementing threat assessment on a post-incident campus. And Chapter Six summarizes pitfalls to avoid and highlights ongoing challenges for the Virginia Tech Threat Assessment Team that might affect other campus threat assessment teams. Throughout the chapters, we discuss challenges that Virginia Tech encountered in developing its threat assessment process, highlight key decision points for the university and its Threat Assessment Team, and describe workable solutions developed by the university.

In the course of building its behavioral threat assessment capacity, Virginia Tech created considerable documentation to support its Threat Assessment Team and related efforts. This documentation, which ap-

pears in Appendices B and E, includes an array of institutional policies, the team's mission statement, information distributed university-wide to announce and promote the Threat Assessment Team, wallet reference cards, position descriptions, and other materials. This information is included herein to provide examples to any institution that is developing a behavioral threat assessment capacity or enhancing an existing threat assessment process. It is important to note that every institution is different and that the examples provided here may not be appropriate for a particular institution to use. But these resources can still serve as a starting point for institutions to consider in crafting their own policies, mission statement, public awareness message, and other relevant materials. Additional resources, which are listed at the end of this book, provide general templates for use in the creation of threat assessment processes.

CHAPTER ONE

Background and Project Origination

Background and Project Origination

In the immediate aftermath of the April 16 shootings, a number of key individuals reached out to Virginia Tech and offered assistance that became crucial to the immediate-, medium-, and longer-term recovery of the victims and survivors as well as the entire university community.⁶ To help the university facilitate prevention efforts as well, then-U.S. Secretary of Education Margaret Spellings contacted Virginia Tech President Charles Steger and offered the financial resources and expertise of the U.S. Department of Education's Office for Safe and Drug-Free Schools (OSDFS). Secretary Spellings and the OSDFS could see benefits, for Virginia Tech as well as for higher education institutions in general, in partnering to learn how to identify and intervene with at-risk behaviors in a complex higher education setting.

Origination of the Virginia Tech Demonstration Project

To launch this effort, a group of university administrators and faculty members came together within the first few weeks after the shootings to design what would become the Virginia Tech Demonstration Project. Several of these individuals had previously worked with the Office of Safe and Drug-Free Schools on projects related to school safety. These individuals were already familiar with the K-12 threat assessment model and with the positive impact that mental health and support services can have when intervening with at-risk behavior. Through the demonstration project, this group sought to build a capacity for Virginia Tech to be able to assess threats; to establish cross-functional processes to enhance opportunities for early detection of and intervention with at-risk behavior on campus; and to identify or create services to reduce at-risk behavior, whether the risk was for harm to others, harm to self, or both.

In addition to discussions precipitated by state and university reviews of the shootings, the university community learned from resources introduced by the Office for Safe and Drug-Free Schools. These external resources included research data, materials, and individuals with

⁶ To help the university with victim recovery, the U.S. Department of Justice, Office for Victims of Crime, provided Virginia Tech with a grant to fund assistance and recovery resources for victims of the shootings.

established credentials and experience in school safety. In July 2007, while the university was finalizing the elements of the demonstration project, the OSDFS hosted a forum at Virginia Tech that brought together state and national experts who presented information and led discussions about the prevention of and response to violent behaviors in a higher education setting. This forum, in combination with the discussions occurring on and off campus, provided additional support, expertise, momentum, and guidance for the formation of the elements in the university's demonstration project.

Existing Violence Prevention and Assistance Resources on Campus

It is important to note that, like most institutions, the university was engaged in safety and security efforts before the shootings occurred. As external and internal post-incident reviews noted, the university had policies, procedures, and programs in place for students and employees. For example, at the time of the shootings, the university already had a Care Team, which was formed to assist students in crisis, as well as on- and off-campus mental health referral processes for students and employees; a campus and workplace violence prevention policy; policies addressing the conduct of students and employees; and safety and security outreach and education efforts conducted by various university departments, including the police department.

Also prior to the shootings, the university had identified as a priority the integration of all-hazards emergency planning and response. To support these planning and response efforts and to best support its new threat assessment and case management functions, university leaders designed an over-arching committee structure within which threat assessment and violence prevention are elements.

The Virginia Tech safety and security committee structure was designed and established with the knowledge that violence prevention and threat assessment functions are best actualized in concert with other risk-assessment and safety and security efforts. The university recognized the value of having executive leaders engaged in the oversight of safety and security matters and, thus, established a University Safety and Security Policy Committee that is responsible to and chaired by the university president. Reporting to the committee are four sub-

committees: (1) the Threat Assessment Team, (2) the Campus and Workplace Violence Prevention Committee, (3) the Health and Safety Committee, and (4) the Emergency Management and Risk Assessment Committee.⁷ Each committee is chaired by a person with professional knowledge of and responsibility for the areas addressed by the committee. The Threat Assessment Team is chaired by the chief of police, the Campus and Workplace Violence Prevention Committee is chaired by the chief of police or his designee, the Health and Safety Committee is chaired by the director of environmental health and safety, and the Emergency Management and Risk Assessment Committee is chaired by the director of emergency management. The safety and security structure itself includes elements that existed before the shootings and incorporates new elements aligned with recently enacted state laws and revised university policies and practices. As a university-wide function, threat assessment and the policies and committee structures that support it have evolved since the team was first established in December 2007. In Virginia, state legislation passed in 2008 mandates threat assessment teams and campus and workplace violence prevention committees.

The committee structure established by the university to support safety and security was designed to strengthen the efforts of each committee by establishing formal lines of communication and a visible connection between all safety and security efforts across the institution. The Threat Assessment Team was established in advance of state law and before the university's safety and security committee structure was determined. However, embedding threat assessment and violence prevention efforts in a broad institutional context increases opportunities for raising awareness, strengthens collaborations across safety and security functions, and provides institution-wide infrastructure for assessing threats and preventing violence. A grant from the U.S. Department of Education allowed Virginia Tech to strengthen these existing structures and policies and to launch case management functions for students and employees as a new and integral component of violence prevention. The grant also provided resources for Virginia Tech's newly

⁷ Please see Appendix B for a diagram of these Virginia Tech committees and the reporting structure among them.

established Threat Assessment Team and ensured that the team received training, materials, and support to advance its charge.

Key Elements of the Demonstration Project

Several assumptions guided the final articulation of the demonstration project. First, the guidelines for the grant proposal clearly indicated a priority placed on the creation and institutionalization of processes that support the early identification of individuals who might pose a threat. Second, it was important that elements of the project be institutionalized over the course of the grant period, which required the team to identify key elements (such as case management) and secure the commitment of executive leaders to the on-going financial and organizational support for those key elements. Third, because efforts associated with the demonstration project required executive-level support, the senior vice president and provost agreed to serve as principal investigator on the demonstration project. Fourth, the grant would only succeed using a multi-disciplinary approach. Consequently, the demonstration project included several multi-disciplinary teams to provide leadership and guidance to elements within the demonstration project itself. Fifth, Virginia Tech was committed to participating in discussions about safety and security but did not want to present itself as expert on these matters. Rather, the university saw itself (and continues to do so) as the beneficiary of support offered to advance safety and security and is therefore committed to sharing what it has learned and to continue to improve and learn through collaborations with colleagues across the country and around the world.

The final demonstration project design consisted of four elements: (1) a mental health assessment consisting of a survey of students and employees regarding post-trauma symptoms, (2) the creation of a multi-disciplinary threat assessment task force, (3) the creation of case management functions for employees and students, and (4) the dissemination of demonstration project results.

Assessment of Mental Health Needs. The first element—the mental health assessment—consisted of helping to fund a project designed to assess the post-trauma reactions of university employees and students using a survey conducted by researchers interested in establishing

benchmarks for mental health needs following large-scale traumatic events. The research consisted of disseminating surveys to students and employees in early fall 2007, a process that was repeated in summer 2008 (see M.H. Hughes *et al.* reference in Appendix D). Faculty members and campus mental health service providers will be using the data gathered to guide focused interventions and to assist in determining what wellness and mental health interventions might be needed in the longer-term aftermath of the shootings.

Creation of Threat Assessment Capacity. The second element of the demonstration project involved establishing a multi-disciplinary team that would identify and evaluate the violence potential of individuals of concern. The university formally established the Threat Assessment Team in December 2007.⁸ The grant proposal anticipated creation of this multi-disciplinary, institution-wide body and provided funds to secure training for its members and for staffing the team. The Threat Assessment Team was created under the direction of the president, with the chief of police as its chair. The team began its work immediately, followed by creating policies and procedures as well as adjusting related university functions. The continuing evolution of supporting policies and functions remains a high priority for the university.

Creation of Case Management Functions. Third, the demonstration project established three full-time case manager positions. Case management proved to be a key ingredient in the success of the project. The grant provided funds to hire two case managers in the Division of Student Affairs and one case manager in the Department of Human Resources. Each manager served a different purpose, but all were assigned responsibilities for serving as links between individuals, services, and processes. By serving as liaisons between individuals and services, by providing support and guidance, and through brokering services, case managers connect individuals with varied units within the university and make referrals, as needed, for behaviors of concern. Case management positions did not exist at the university before the implementation of the demonstration project but now provide important functions in the overall goal of violence prevention.

⁸ See Appendix B for a copy of the Presidential Memorandum that created Virginia Tech's Threat Assessment Team and named its initial members.

Dissemination of Demonstration Project Results. The fourth and final element of the demonstration project outlined the university's interest in participating in national discussions about violence prevention by sharing information about the implementation of the demonstration project. Virginia Tech remains committed to sharing the experiences and lessons it learned from the tragedy. Thus, a goal of the demonstration project has been to collect information and disseminate the ideas, programs, services, challenges, and successes in implementing efforts designed to prevent violence.

Summary

The Virginia Tech Demonstration Project propelled the work of the Threat Assessment Team as part of efforts with institutional impact. Establishing and launching the institution's threat assessment capabilities are covered in depth in the following chapter. University leaders discussed various approaches to establishing a team and made several key decisions that guide Virginia Tech's threat assessment processes.

CHAPTER TWO

Critical First Steps in Creating Virginia Tech's Threat Assessment Capacity

Critical First Steps in Creating Virginia Tech's Threat Assessment Capacity

The reports issued by Virginia Tech and by the Virginia Governor's Review Panel on the Virginia Tech tragedy recommended that the university develop and implement a behavioral threat assessment process to prevent campus violence as well as to address threats and other troubling behavior that may arise from students, faculty, staff, or visitors. But even before these reports were published, Virginia Tech President Charles Steger decided that Virginia Tech should develop a threat assessment team. Using the grant that the university had received from the U.S. Department of Education, Office of Safe and Drug-Free Schools to identify and address at-risk behaviors on campus following the shootings, Virginia Tech embarked on a process of creating, training, and implementing a campus threat assessment process.

Envisioning the Process

Before Virginia Tech's president announced the creation of the university's Threat Assessment Team, various university leaders devoted some time to envisioning how they wanted the threat assessment process to work and how they wanted the Threat Assessment Team to interact on campus. Of particular concern was the fact that the university already had a Care Team in place to assist students in crisis and to address student behaviors of concern. The president and other leaders had to determine if they wanted to keep the Care Team or merge it into the new Threat Assessment Team. They also had to decide how they wanted the Threat Assessment Team and Care Team to interact should they decide to keep the Care Team intact. Other key questions included whether one unified threat assessment team should handle all cases involving students, faculty, and staff or if separate teams, one to address student behavior of concern and another to address employee (i.e., faculty and staff) behavior of concern, would be preferable. A dimension of the conversation included how to best respond to concerning behaviors demonstrated by visitors or individuals not associated with the university but about whom there might be a concern (for example, the spouse of an employee). The final key question that university leaders anticipated might spark debate involved the membership of the Threat Assessment Team. Although certain positions

were required by Virginia law, others would be determined by the university president.

Campus leaders credit this exercise of envisioning the Threat Assessment Team and process before beginning to build the team with helping the university to anticipate and prepare for questions and concerns that did eventually arise in building the threat assessment process. Even so, there was considerable debate among leaders over these issues. According to everyone who was involved in the demonstra-

tion project and other key university leaders, no one resisted or opposed the president's idea to create a threat assessment capacity. However, considerable debate was generated about whether Virginia Tech should have one threat assessment team that would handle all cases regarding at-risk behavior—whether in students, faculty, or staff—or should have two teams, one to handle

Critical Question: Should an institution establish separate threat assessment teams for student cases and for faculty/staff cases—or one threat assessment team to handle all cases?

University Decision: Virginia Tech opted to establish one team to handle all cases, whether they involve students, faculty, staff, or visitors.

student cases and another to handle employee cases. The “one team or two” issue, as many characterized it, was for some the most critical decision to be made about the university's developing threat assessment process. Debate over this issue appears to have followed similar lines in discussions that occurred in the years prior to the shootings when the university implemented its Campus and Workplace Violence Prevention Policy. Debate over creation of that policy involved some on campus arguing for separate violence prevention policies for student conduct and employee conduct, whereas others argued for a unified policy. Ultimately, Virginia Tech opted for one unified campus and workplace violence prevention policy.

The debate over the issue of one threat assessment team or two was intense at times. Those who advocated for separate teams wanted

to focus their resources and efforts on student care and intervention, arguing that students would constitute the majority of cases a unified team would handle. Those advocating for a unified team agreed that the team would likely handle mostly student cases but felt that it was important to have only one team so that those handling faculty and staff cases would get the same amount of experience as their student-focused colleagues by participating on all cases. Those advocating for a unified team also argued that disruptive or troubling behavior could have a ripple effect across campus, regardless of whether it comes from a student, faculty member, or staff member. They believed it was important that there be one team with one philosophy, one focus, and one level of experience. Finally, those advocating for a unified team expressed concern that establishing separate teams could create yet another campus “silo” that could inadvertently block information-sharing between teams.

Ultimately, it fell to President Steger to determine whether Virginia Tech should have one threat assessment team or two, and he decided on one unified threat assessment team. It was clear from the people interviewed that once the president made his decision, those involved in the debate supported it. This support can be attributed to the fact that there was never disagreement over *whether* Virginia Tech should establish a threat assessment capacity, just debate over *how* to do it.

Team members and university leaders interviewed for this project have said that in retrospect, having one team seems to have served Virginia Tech well. Team members have noted that because so many students hold part-time jobs on campus, the representative from Human Resources has been involved in far more student cases than they expected she would be. Had there been separate teams, the Human Resources perspective on student cases may not have been as apparent or logistically could have been more difficult to access. Team members have also noted that working together on one team seems to have enhanced appreciation among team members for each other's perspectives and experiences and has helped to minimize misunderstandings or misperceptions through regular discussion and group decision-making.

Determining Team Membership

The next decision involved who should serve on the team. Similar to the president's executive decision in creating the team and in deciding there should only be one team, the president selected the first team members. Within the Commonwealth of Virginia, laws passed by the Virginia legislature in 2008 (Section 23.9.2 of the Code of Virginia) mandate that all public institutions of higher education have threat assessment teams and specify that certain offices be represented on those teams. Thus, within Virginia at least, questions about which offices would be included on the threat assessment team were answered in the legislation. Consistent with the Code of Virginia, members initially appointed to the Virginia Tech Threat Assessment Team represent the following offices and entities:

- » Chief of police
- » Dean of students
- » Student Affairs representatives (2)
- » Academic Affairs representative
- » Legal counsel
- » Human Resources representative
- » Clinical psychologist representative

Even with state law requiring that certain offices or institutional functions be represented on the team, there was considerable debate among Virginia Tech's senior leadership regarding who should represent those offices and who else should serve on the new team. For example, an important resource for the team has been involving the university registrar, and the team has benefited from her ability to provide information, when appropriate, about a student's academic progress. In addition, the registrar's access to student records and knowledge of the laws and regulations associated with confidentiality have been invaluable.

Additional debate centered on whether to include someone on the team who could speak to faculty issues in cases involving threatening or troubling faculty behavior. When it came to team members who could speak to student issues or to staff issues, it was relatively clear which office or personnel should be included. Because several offices

are involved in addressing faculty issues, it was less clear who—if any one—should be included to speak to faculty issues in cases involving behavior of concern from faculty members. The university president opted for a combination of existing team members: the representative from Human Resources, who was already on the team to speak to staff issues, and the vice president for Academic Affairs, who was already on the team to answer questions about academic issues of students who were reported to the Threat Assessment Team.

One challenge that Virginia Tech faced was ensuring that the right people were on the team and not just having the right offices represented. Those interviewed said that it is critical that team members be able to work together; thus, the personalities of team members matter nearly as much as the areas/departments on campus that they represent. University leaders emphasized that individuals chosen to represent certain offices did not necessarily have to be the highest ranking person within their respective offices if someone else within the office was better suited in terms of his or her personality to sit on the team. In addition, some university leaders expressed concern about the possible difficulty of having personnel serve on the team alongside their supervisors. Several among the leaders argued against having supervisors and their subordinates on the same team to ensure that concerns raised and opinions voiced would never be hindered by workplace hierarchy. That said, university leaders emphasized the importance of team members keeping their supervisors informed about situations that might require their supervisors to act. Such situations could be handled between individual supervisors and their subordinates or as a matter of team procedures.

University leaders have cautioned that an institution can err by having too many members on the threat assessment team, which can reduce its responsiveness as well as make the task of scheduling meetings unnecessarily difficult.

Virginia Tech's president has advocated that selecting members for the team should be a presidential prerogative for any institution that is setting up a team. But in practice, he made decisions regarding team membership in close consultation with the team's chair and with input from university leaders to ensure that their perspectives were included.

Selecting a Team Leader

With respect to appointing a team chair, Virginia Tech opted to go with the chief of the Virginia Tech Police Department. Other university leaders agreed that it was critical that the police department serve as a key player on the threat assessment team and preferably as the team leader.

One challenge the university had not anticipated, however, was the significant amount of time that would be required of its Threat Assessment Team members, even in the early days of the team's existence. Some of those interviewed wondered whether, in hindsight, it was asking

too much of the chief of police to have him chair the team when doing so took so much time. However, there has been unanimity that the police chief was the best person to lead the team in its initial stages for several reasons. First, his position crosses campus constituencies. That is, he does not come from a faculty, staff, or student perspective; rather, his perspective is campus-wide. Second, he has the

Implementation Challenge:

Institutions may find it difficult to gauge how much time working on the threat assessment team will demand of its members and especially its chair.

University Solution: Virginia Tech helped mitigate the time demands on the team chair by adding administrative and operational support positions to the team.

rank and stature necessary to make command decisions about cases when necessary and to gain the attention of the university president and other leaders without having to work through layers of hierarchy. Third, he is widely liked and respected on campus (and by team members), lending immediate credibility to the new Threat Assessment Team's efforts. So although naming him to the position of team chair has demanded a tremendous amount of time above and beyond his position as police chief, all who were interviewed agreed that having him serve as the first chair was critical to the team's early success.

Since naming the police chief as chair, Virginia Tech has taken two steps to manage the demands on his time: (1) the university approved

adding a full-time team coordinator position, a position filled by a former Virginia Tech graduate student who was involved in setting up the team and thus was familiar with its work, and (2) the university hired an experienced threat assessment professional from outside the university to fill the position of university threat manager and deputy chief of police and to run the team's day-to-day operations. The Virginia Tech chief of police continues as chair of the Threat Assessment Team but now has considerable operational and administrative support.

Handling Issues of Confidentiality

Team members and university leaders alike addressed the importance and challenge of defining confidentiality early in the process of building their threat assessment capacity. Among those interviewed, individuals who had worked at institutions other than Virginia Tech noted that different institutions have different professional philosophies and practical strategies with respect to confidentiality of information and that these philosophies and practical strategies may have a broader reach than what specific confidentiality laws (federal and state) dictate. Several team members spoke about the importance of examining an institution's particular philosophy on confidentiality before thinking through issues, such as the level of detail of records kept on cases that a threat assessment team would handle, and determining how to store the case records. In the U.S., for example, records created by an institution's law enforcement unit (e.g., its police department or campus security unit) and maintained for law enforcement purposes are not considered to be subject to the Family Educational Rights and Privacy Act (FERPA) provisions that generally protect the privacy of student educational records but also allow students access to their own records for review if requested.⁹

⁹ See, e.g., Deisinger, G., Randazzo, M., O'Neill, D., & Savage, J. (2008). *The Handbook for Campus Threat Assessment and Management Teams*. Stoneham, Mass.: Applied Risk Management; and, Dunkle, J., Silverstein, Z., & Warner, S. (2008). See also Dunkle, J., Silverstein, Z., & Warner, S. (2008). "Managing violent and other troubling students: The role of threat assessment on campus." *Journal of College and University Law*, 34(3), 585-636, for more detailed discussions regarding U.S. laws that may impact information sharing in campus threat assessment.

Case Documentation and Record-Keeping

Virginia Tech's Threat Assessment Team developed a multi-layered system of documentation for its case records. Each case brought before the team is documented in the official minutes of the meeting where it is discussed. The case is also added to a master spreadsheet, and a record of the case is created in the police records management system of the Virginia Tech Police Department.

For each meeting, the team coordinator types the minutes of the meeting, creating an official meeting record. For each case discussed at the meeting, the minutes include information known at the time about the situation, the team's assessment of the situation, and the plan for managing it. After the minutes are reviewed and approved by the team, a hard copy is placed in a file that includes each case that is discussed. This hard copy file contains all information known about a situation/subject and is kept in the chief of police's office.

The details of each situation discussed by the team are entered into a searchable database that includes the subject's university ID number; whether the subject is currently enrolled or employed at Virginia Tech; his or her Virginia Tech affiliation; how he or she was brought to the attention of the team; the name, if applicable, of the target of the threats or concerning behaviors; any holds or restrictions placed on his or her university accounts; and the dates that the case was discussed by the team. This database is searched any time a new case comes to the team's attention to see if the person of concern has been discussed by the team previously and, if so, to access the previous case record.

Cases reviewed by the Threat Assessment Team and investigated by the Virginia Tech Police Department are recorded in the police records system. These cases are marked confidential and are available for review only by select members of the police department.

Securing Basic and Advanced Threat Assessment Team Training

All who were involved in the demonstration project emphasized the importance of securing professional training for Virginia Tech's new Threat Assessment Team by individuals with demonstrated experience in assessing threats. Since its inception, the team has gone through multiple basic and advanced threat assessment training classes, con-

ducted by three of the nation's top campus threat assessment experts. Advanced threat assessment training included tabletop exercises where the team worked through case scenarios in the same manner that they would an actual case. In addition, various team members attended statewide and regional training conferences on behavioral threat assessment and case management. Training included strategies for balancing the demands of threat assessment work with personal life concerns and for watching out for fellow team members in efforts to maintain healthy quality of life while participating on a threat assessment team.

Summary

The launching of Virginia Tech's Threat Assessment Team required that university leaders make several key decisions. These decisions included determining the process; deciding team membership and leadership; and debating important issues such as confidentiality, record keeping, and training for the team. While these discussions were occurring and initial decisions were made, the Threat Assessment Team was launched and began meeting regularly in January 2008. Team members, with the guidance of university leaders and on- and off-campus resources, worked on the next steps of implementing a robust threat assessment process at Virginia Tech. The mechanics of the team's operations needed to be worked out, and the university community needed to be engaged in understanding and welcoming threat assessment as a campus improvement.

CHAPTER THREE

Efforts to Support and Enhance Virginia Tech's Threat Assessment Activities

Efforts to Support and Enhance Virginia Tech's Threat Assessment Activities

Once the Virginia Tech Threat Assessment Team had been created and its membership decided, several critical steps were taken to launch the team's efforts and to overcome initial challenges that it faced.

Empowering the Team to Act

One step that university leaders agree was critical was to clarify the roles and responsibilities of the Threat Assessment Team and its members. The policies that Virginia Tech adopted to create the team and support its efforts empowered the formal Threat Assessment Team to act in a way that was not possible when the process was only informal. Along similar lines, university leaders underscored the fact that it is critical to provide resources so that the team can actually *do* its work. For Virginia Tech, this meant having a back-up for each member of the team in the event a member could not attend a meeting. This also meant ensuring that the team was aware of and could access the new case management resources that the university established through the OSDFS grant (see Chapter 4 for more information on establishing case management resources). Those who were interviewed recognize that assessing whether a person is posing a threat is only one component of the team's work and that the real value in having a team is to be able to take action to reduce that threat once it is identified. Having access to case management resources both on and off campus is critical to a team's ability to reduce any threats.

In addition to empowering the team through threat assessment policies, the Virginia Tech president empowered the team to act through more informal communications and support. The president wanted to ensure that Virginia Tech's Threat Assessment Team could be responsive in a situation and would not be hampered by institutional bureaucracy or hierarchy if the need arose. The president made it clear that team members and leaders can and should act without his permission if necessary and ensured them that he will stand behind their decisions, even if lawsuits arise as a result. At the same time, several university leaders made it clear that the president should be notified of any imminent threat and also needs regular briefings from the Threat

Assessment Team regarding the numbers and types of cases they are reviewing. With that information, the president can better understand the range of situations and troubling behaviors the team has encountered and be aware of any patterns that may emerge or that the team has identified (e.g., if several cases arise from the same department or supervisor). In addition, keeping executive leaders apprised of the work of the team allows the administration to assess the administrative and support needs of the team and to align resources as needed.

Strategic Planning and Ongoing Case Demands

One factor that impacted Virginia Tech's new Threat Assessment Team was a steady stream of active and new cases ever since the team began its operations. Having back-ups for team members has ensured that the team could stay abreast of its caseload and could hold meetings about cases even if certain original team members were absent.

The active caseload from the team's outset made it difficult for the team to find time to craft a mission statement, set out its threat assessment protocols, and engage in other planning activities designed to help set its direction and function. The team has had to devote nearly all available time to investigating, assessing, and managing cases, rather

than to any high-level planning activities. Lacking a mission statement had a negative impact on the initial interactions between the Threat Assessment Team and the Care Team and hindered case referrals between the two teams, a factor that has been a source of frustration for both teams. Team members cautioned that they found it critically important to be clear in their mission statement about the purpose of threat assessment. In

Critical Planning Step: Take time to develop a threat assessment mission statement, specifying what cases the team will handle.

University Decision: Although Virginia Tech's team took more than a year to develop a mission statement, its adoption has resulted in greater clarification and agreement over the types of cases the team handles and improved the process of referrals to and from the Care Team.

crafting their mission statement, they wrestled over whether the Threat Assessment Team should handle cases that only involved potential physical harm or violence to others, or should also tackle cases that involved risk of suicide or unintentional self-harm. Defining what cases they would handle also had implications for the work of the student-focused Care Team. Depending on the definition selected, some of the cases previously handled by the Care Team would be handled by the Threat Assessment Team instead. Team members had to be comfortable with the fact that they would not cover those cases not specified by the mission statement and that they would have to entrust those cases to the judgment and actions of other entities on campus.

The Threat Assessment Team ultimately decided to handle cases that posed the possibility of violence or harm to the campus community or others. In addition, the team opted to be the first point of contact for all temporary detention order (TDO) cases (those in which a student, faculty member, or staff member is held for an involuntary emergency psychiatric evaluation). At the time of this writing, cases that appear to entail suicide risk without risk of harm to others or that are about unintentional self-harm (such as a severe eating disorder) are under discussion for handling by the Care Team (cases involving students) or the provisional Employee Resource Team (cases involving faculty or staff). Team members from both the Threat Assessment Team and the Care Team have acknowledged that having a mission statement for the Threat Assessment Team has clarified and streamlined case referrals between the two teams.

Managing the Team's Caseload

The Threat Assessment Team has been busy with active cases ever since it was created, which could be a function of several different factors or a combination thereof. For example, in the wake of the shootings, faculty, staff, and students have been on higher alert regarding threats or other troubling behavior. For new threat assessment teams at institutions that have not experienced—or not recently experienced—a shooting or similar traumatic event, this is less likely to be the case. For those institutions, their caseload would probably begin smaller and grow more gradually than did the caseload for the Virginia Tech Threat Assessment Team.

Threat Assessment Team members pointed to two things that helped them to become more efficient in their threat assessment work: (1) regularly-scheduled meetings (with clear guidelines on when to call emergency meetings and who could do so) and (2) early training on how to handle threat assessment cases. The advanced training with tabletop exercises in particular was credited by team members and the team chair with giving them confidence in their abilities and in their decisions in cases they already had handled. Trainers with professional experience in assessing threats within a higher education setting were particularly welcomed by team members, who appreciated their knowledge, their experience in higher education settings, and their ability to understand the unique nature of working in a higher education context. The training also allowed them to be more efficient in delegating tasks to specific team members during any given case investigation. It allowed individual members to gain confidence, not only in their own abilities, but also in those of their teammates.

Establishing Procedures and Protocols

Many members of the Threat Assessment Team underscored the importance of establishing, in writing, clear procedures and protocols for how they should conduct their work. They said it was one thing to read about the theory of campus threat assessment, but it was another thing entirely to articulate the nuts and bolts of how to handle each case. Team members also emphasized that these protocols are different from the team's mission statement. The mission statement defines the scope of cases that the team will handle; its contents, therefore, help to guide the team's outreach efforts to the campus community and its message regarding the types of situations and ranges of behavior the team wants reported to it. The team's threat assessment protocols, however, serve as standard operating procedures for how it will proceed once it learns about a given person or situation of concern. The mission statement sets forth *what* cases the Threat Assessment Team will handle; the protocols dictate *how* the team will handle them. Team members interviewed for this project were emphatic that the team needed both—and needed them as early as possible. As stated above, the number of active cases faced by the Threat Assessment Team from the beginning made it difficult to find time to articulate those protocols, but the team's administrative coordinator played a

valuable role in overcoming this problem. After observing several team meetings and reviewing the handling of previous cases, she drafted the team's steps and procedures for the casework. Those draft protocols served as a starting-off point for the team to discuss and refine, an easier task for the team than drafting the protocols from scratch. Members suggested that for threat assessment teams that lack the time to craft protocols and procedures during their regular meetings, they could meet separately to discuss them (such as in a day-long retreat off-campus). Team members felt that it was vital for their operations to have established protocols and advised new teams to establish their protocols as early as possible. Team members emphasized, however, that a new team's protocols should be reviewed after several months or a year in operation so that the protocols can be revised to best reflect procedures and other steps or processes needed to enhance the team's work.

Critical Planning Step: Establishing protocols and procedures that specify how the team will handle its cases.

University Decision: Virginia Tech's new Threat Assessment Team coordinator observed team meetings and reviewed case files, then drafted initial protocols based on those observations. Team feedback and discussion about the draft protocols yielded the final protocols.

Building University-wide Confidence in the Process/Team

Interviews with university leaders revealed consensus that Virginia Tech already had an informal process in place before the shootings for handling persons of concern, but establishing the Threat Assessment Team made it a more formalized process. Having a formal threat assessment team and case management resources also made the process more widely known, something that is critical to successful threat assessment in general. The team depends on the entire campus community to report troubling behavior and situations to the team before it can gather more information, evaluate the situation, and take appropriate action. The concept of having a threat assessment team was more palatable to the university community once it was clear that

the university had always had an informal process for handling individuals (especially students) who had raised concern and that the Threat Assessment Team would make that process more formal, systematic, and transparent.

University leaders and other individuals continue to address issues typical for implementing a coordinated response to concerning behaviors. Frequently asked questions include: To what degree is the Threat Assessment Team a reflection of a “big brother” approach by the university administration? To what degree are records kept? By whom? With whom are information and records shared? Making a referral might engender concerns about “snitching” on a classmate or colleague. These and related concerns are not dissimilar from the types of discussions needed at most institutions when implementing necessary policies and procedures related to reports of harassment and discrimination or other forms of problematic behaviors within any organization.

Encouraging Reporting to the Team

Related to the notion of building confidence in the team and the threat assessment process, those interviewed all stressed that it was critical to encourage people on campus to report concerns to the Threat Assessment Team. As mentioned earlier, a threat assessment team is largely dependent on reports it receives from across campus to effectively do its work. Setting up a successful campus threat assessment capacity must, therefore, include efforts to encourage the entire campus community to report threats and other concerning behavior to the team. Encouraging reporting can take many forms, including conducting general campus-wide awareness sessions, participating in small department meetings, and “piggy-backing” on information-sharing mechanisms or conduits that already work on campus. For Virginia Tech, one key conduit of reports to the Threat Assessment Team was Virginia Tech’s Care Team, where many university personnel were already comfortable reporting troubling student behavior. A similar mechanism already existed for reporting concerns about troubling or threatening staff behavior to Human Resources. Yet no such clear mechanism exists for reporting concerns about faculty behavior. Colleagues and students can report their concerns to their respective

department chairs, who, in turn, may report the behavior to the Threat Assessment Team. But no such report is required, just encouraged, so the system depends in large part on the judgment of individuals who receive the initial reports and decide whether or not to refer matters to the Threat Assessment Team.

In order to encourage everyone within the Virginia Tech community to report threats and concerning behavior to the Threat Assessment Team, the team uses multiple mechanisms to promote its activities. In particular, the team has focused efforts on training the campus about what the team does, how prevention is possible, the array of behavior and concerns it wants to hear about, and what happens once it receives a report. In addition, the team has distributed a one-page flyer describing its activities and providing guidance on what kinds of behaviors to report and how to do so (see Appendix E for a copy of the flyer). The team has also focused on dispelling misconceptions or misunderstandings regarding confidentiality laws such as FERPA and HIPAA¹⁰ that have impacted information-sharing at Virginia Tech and other institutions in the past. So far, this general awareness training has been conducted for large audiences of faculty and graduate student teaching assistants, for small departmental meetings, and in one-on-one conversations. The Threat Assessment Team also plans to conduct similar awareness trainings periodically to help counter turnover in the faculty, staff, and student populations and to serve as a reminder of its work.

In addition, the Office of the Dean of Students has been charged with promoting the services of the Care Team, the case management process, and the Threat Assessment Team. To do so, the office created a resource card (see Appendix E for a sample) with the numbers of various people to call regarding distressed students and contact information for the Threat Assessment Team. The card is a resource that has been well received on campus.

¹⁰ FERPA refers to the Family Educational Records Privacy Act (please see www.ed.gov/policy/gen/reg/ferpa/index.html for more information). HIPAA refers to the Health Insurance Portability and Accountability Act (please see www.hhs.gov/ocr/privacy/ for more information).

Summary

The efforts to support and enhance threat assessment activities included empowering the team to act, managing the team’s caseload, establishing initial policies and procedures, building the university community’s confidence in the team, and engaging the university community in making referrals. In addition to these policies and procedures required for the smooth and successful operation of the Threat Assessment Team, case management was an important element in the demonstration project and in the implementation of a comprehensive violence prevention scheme for the university. Case management operations were established for both employees and students and proved to be an important collateral function for referring individuals to the Threat Assessment Team. Case management services provide the university with the opportunity to deliver supportive services to individuals while coordinating with the Threat Assessment Team, Care Team, mental health services, and other services. Case management serves as an important element in the overall goal to prevent campus violence.

CHAPTER FOUR

Implementing Case Management Services

Implementing Case Management Services

At the heart of effective threat assessment efforts and violence prevention is case management: coordinating and brokering the resources necessary to intervene with a particular person or situation of concern to reduce the risk or threat posed, connecting the person with necessary help, and monitoring the progress of the intervention plan. Several of the after-action reviews conducted on the April 16 shootings at Virginia Tech highlighted the need to ensure that distressed students receive coordinated on-going care and treatment—essentially, case management. These reviews also noted that failure to provide such coordinated follow-up efforts for distressed students could leave the student and the institution at risk for experiencing further trauma or disruption.¹¹

In addition to the recommendations from the various reviews of the April 16 shootings, research and practical case experience tell us that many individuals who plan acts of violence or who engage in threatening or worrisome behavior do so because of personal problems or out of extreme anguish or despair, including suicidal thoughts and plans,¹² and that a key element of effective violence prevention in these cases can be efforts to address that desperation.¹³ The good news is that a wide array of resources can mitigate extreme anguish or suicidal thoughts/plans and can help individuals solve their personal problems. Harnessing those resources in a particular threat assessment case is what case management is all about. Case management is

“Above all else, institute a case management model and hire a case manager.... Somebody needs to be dedicated full time to following 30, 40, 50-plus students who need assistance.”

James T. (Tom) Brown
Dean of Students
Virginia Tech

¹¹ See, for example, Virginia Tech Review Panel (2007), retrieved on October 31, 2009, at www.vtreviewpanel.org/report/index.html.

¹² See, for example, Vossekuil *et al.* (2002).

¹³ See Fein *et al.* (2002).

particularly effective when it is coordinated and well monitored; that is, when the threat assessment team develops a case management plan that is then implemented, monitored to ensure that it is working and that there are no unintended negative consequences, and adjusted if it is not working as planned.

A major component of the U.S. Department of Education grant to Virginia Tech was to develop and sustain case management resources at the university. The grant funding allowed Virginia Tech to create three case manager positions: two dedicated for student cases and one for employee cases. This model of case management reflects Virginia Tech's residential campus, the structure and function of student support services within the Division of Student Affairs, and the manner in which the university provides human resources. Since the inception of the grant, university personnel have succeeded in institutionalizing all three positions, moving them from grant-funded to permanent status.

The functions associated with case management are important elements in identifying and referring individuals at risk. Many of the university leaders and Threat Assessment Team members who were interviewed stressed the importance of Virginia Tech instituting a formalized case management process to coordinate assistance and monitor intervention for students and employees of concern. For example, Virginia Tech Dean of Students Tom Brown strongly encouraged institutions: "Above all else, implement a case management model and hire a case manager.... Somebody needs to be dedicated full time to following 30, 40, 50-plus students who need assistance." This appears to be the direction in which many higher education institutions are starting to go. According to the AUCCCD Annual Survey for University and College Counseling Center Directors, in the 2006-2007 academic year (the year that included the Virginia Tech shootings), only one higher education counseling center reported having a case manager on staff; in the survey conducted for the 2007-2008 academic year, the number had jumped to 28 counseling centers.¹⁴

14 Rando, R. & Barr, V. (2009). *The Association for University and College Counseling Center Directors Annual Survey, 2008*. Indianapolis, Ind.: Association for University & College Counseling Center Directors.

Case Management for Students

Case management functions for students were established in two departments within the Division of Student Affairs. One case manager is dedicated to responding to and managing cases that involve referrals of students for evaluation and/or hospitalization. Within the student counseling center, the case manager is assigned to attend hearings that are held to determine whether a student requires a psychiatric evaluation. These hearings occur off campus as legislated by the Code of Virginia and regulations governing community mental health services. In addition, the case manager works on coordinating mental health services within and external to the university. Frequently, the case manager serves as a liaison between the student "client" and his or her family and on- and off-campus support services. The case manager assists the counseling center in monitoring a student's progress if a student is required to complete elements of a treatment plan before returning to campus or if he or she is engaged in treatment as a requirement to remain on campus.

The second student-focused case manager is dedicated to the management of cases referred to the student Care Team in the Office of the Dean of Students. The purpose of securing two case managers to address cases involving students was the recognition that it is important to have a link between psychiatric services performed off campus and the on-campus mental health services.

Personnel in the Office of the Dean of Students, which houses the university's Care Team, recommend establishing a case-tracking system to facilitate case management efforts. That office recently began using an electronic case-tracking system that pulls all relevant information about each case onto one screen visible on a computer. At the time of this writing, Virginia Tech was still working on integrating the electronic case management system in the Office of the Dean of Students into the electronic system used to manage referrals to the Office of Student Conduct. But even without that interoperability yet in place, staff members in the dean of students office believe that adding an electronic case-tracking system has significantly enhanced their ability to successfully support and monitor distressed students. Staff members also attribute the overall success of the case management process to

the individuals they selected to fill the case manager positions in their office. In particular, they looked for master's-level persons with student affairs backgrounds and after-hours on-call experience, although they did not necessarily look for someone with case management experience.¹⁵

Case Management for Employees

The case management function for employees was established in the employee relations area of the Department of Human Resources (HR). One case manager is dedicated to working with employees who come to the attention, for a variety of reasons, of employee relations and other professionals in HR. The case management function within HR is to serve as a liaison between department heads, managers, employees, employee resources on campus, and the state-provided Employee Assistance Program.¹⁶ Within HR, the case manager has provided outreach services to departments across the university and has assisted in coordinating on- and off-campus support services for a variety of concerns. The employee-focused case manager has also helped to advance Virginia Tech's violence prevention efforts by providing workshops to departments, meeting with managers and employees one-on-one, and partnering with wellness and other university-wide efforts to raise awareness of the resources available on and off campus for employees who might benefit from support services.

One challenge noted by many university leaders and Threat Assessment Team members was that compared with the array of resources available to assist in student cases and, to some degree, in staff cases, far fewer resources are available to assist in faculty cases. Several Virginia Tech leaders noted that unless or until a faculty member became a true, real, or obvious threat, the university had very few options available to intervene to address disturbing or worrisome behavior or an emerging concern. In an effort to develop resources to facilitate earlier assistance or intervention, Virginia Tech crafted and succeeded in passing a policy that allows supervisors to require that any employee,

including tenured faculty members, be referred to the Employee Assistance Program (EAP) if his or her behavior or conduct is sufficiently disruptive or concerning and if a "process of progressive, corrective discipline has been unsuccessful" or if the "presenting problem is of an urgent or emergency nature" (see Appendix B for Virginia Tech's Employee Assistance Program Policy). A required approval process ensures that the referral process cannot be used in a capricious manner; supervisors wishing to make an EAP referral a condition of continued employment must first gain approval from the relevant vice president (for faculty cases) or associate vice president for human resources (for staff cases).¹⁷

Facilitating Information-Sharing

While very different in scope and delivery, case management services for students and for employees have proven to be an essential component of Virginia Tech's overall violence prevention effort. One strength of the case management functions currently in place at the university is the variety of backgrounds and perspectives brought by the case managers and the diversity of the offices in which they reside. Providing university-wide prevention services in addition to delivering case-specific management services appears to be a successful model for Virginia Tech and may prove useful for similarly complex and decentralized institutions. Case management services provide necessary communications and connections across the unintentional divides that can exist between and among the university's "silos." In addition, case managers frequently broker services on and off campus for students and employees because of the managers' backgrounds in mental health and familiarity with social work, psychiatric nursing, and other relevant models of case management.

Summary

Case management services for both students and employees are vital to successful threat assessment and campus violence preven-

¹⁵ See Appendix F for Virginia Tech's case manager position descriptions.

¹⁶ Virginia Tech does not have an Employee Assistance Program embedded within its Department of Human Resources but does have one external to the university that is offered through the state's insurance benefits program.

¹⁷ It is worth noting that there were pockets of resistance to this policy when it was initially proposed, but it was eventually passed following persistent efforts to dispel misconceptions about the policy and to promote the fact that it was assistance-focused rather than threat-assessment focused and could offer a resource or tool to supervisors that they previously lacked.

tion efforts. It is important to remember that the purpose of threat assessment is to assist and intervene if someone poses a threat or if they otherwise need help. Case managers can help broker services and connect individuals to on- and off-campus support mechanisms. At Virginia Tech, the demonstration project afforded the opportunity to establish full-time positions dedicated to providing case management services and linking various offices and functions from across the university. The roles of the case managers are different in each office, but the overarching goal is the same: coordinate and provide appropriate information, referral, and support services to promote the success of the individual and the safety of the campus.

Implementing threat assessment and case management functions has required special attention by university leaders and those responsible for carrying out the day-to-day decisions of keeping the campus safe. Many of the individuals involved in implementing the elements of the demonstration project, including threat assessment and case management, were deeply involved in the university's response to the shootings in April 2007. Serving the university community as both first and longer-term responders has shaped the work of those engaged in launching threat assessment efforts and other elements associated with the demonstration project. As the next chapter illustrates, the April 16 shootings at Virginia Tech remain a backdrop against which university policy and program decisions continue to be made.

CHAPTER FIVE

Special Issues Affecting a Post-incident Campus

Special Issues Affecting a Post-incident Campus

Throughout the steps that Virginia Tech has taken to build, support, enhance, and promote its new Threat Assessment Team and case management services, some particular issues have arisen because Virginia Tech experienced a mass shooting before implementing its threat assessment and case management processes. While many of the obstacles and challenges described in previous chapters are typical of hurdles that institutions may face in establishing a threat assessment capacity, other issues facing Virginia Tech in particular have made creating and running a Threat Assessment Team all the more difficult—and more necessary—because of the tragic incident it experienced and possibly because of the magnitude of that incident. While these experiences may well be unique to Virginia Tech or to campuses that have experienced a shooting or other traumatic event, we believe there is still value for the broader higher education community in reporting on these issues and challenges.

Need for Support Resources for Virginia Tech Personnel

One vital consideration for Virginia Tech in setting up its case management services was to identify and facilitate access to support services for members of the university community who were impacted by the shootings on April 16, 2007. Virginia Tech received a separate grant from the U.S. Department of Justice, Office for Victims of Crime to provide recovery assistance to groups of direct victims of the April 16 shootings. Providing services to the direct victims of the shootings was and is a very high priority for the university. The families of deceased victims, families of injured victims, and those injured in the shootings have received services through the university's Office of Recovery and Support, supported in large part with funds received from the U.S. Department of Justice grant.

In addition, Virginia Tech has come to realize in the years since the mass shooting that a broad array of members of the Virginia Tech community have been significantly affected by the 2007 tragedy. Specifically, many individuals who were on campus or even away from campus but a part of the Virginia Tech community were deeply impacted by the events of April 16, even if they were nowhere near the location

of the shootings. Identifying resources that could provide assistance to this broad array of Virginia Tech community members has become important as well.

Moreover, Virginia Tech has learned that the need for these support services may be a long-term one. Research on responses to trauma has shown that for some individuals impacted by a traumatic event, it can take months or even years for a trauma response to emerge.¹⁸ Even when a response does surface, the trauma response may not look like a “classic” post-traumatic stress response, with flashbacks and significant psychological distress clearly stemming from the trauma. Rather, in some cases, it may appear as a collection of unrelated physical symptoms that have no clear underlying physiological cause. Or the response may simply appear as severe stress or anxiety or as intense anger. These responses can arise in individuals who appeared by all accounts to function well following the traumatic incident but who, years later, may develop extreme anxiety, anger, or physical symptoms that at first glance may not appear to be linked to the traumatic event but, in fact, are. Recognizing this possible delay in response to the April 16 shootings, Virginia Tech has been working to identify and make available an array of support resources for its students, members of the faculty and staff, and families as permanent resources for personnel to access, as needed, over time.

External Scrutiny

Since April 16, 2007, many aspects of campus safety policies and procedures at Virginia Tech have come under scrutiny, from the outside as well as from within the campus. This scrutiny has taken the form of criticism of decisions made and steps taken, but it also has taken the form of many campuses looking to Virginia Tech for expertise in adopting leading-edge campus safety practices and technologies. It is worth noting that this scrutiny has been welcomed by the Virginia Tech leadership in its effort to help all campuses gain a better understanding of campus violence prevention efforts and effective safety measures

through intensive examination of the April 16 shootings. This external scrutiny continues on critical decision-making regarding issues of campus safety. Those in a position to make critical decisions on behalf of the university are aware that whatever future decisions they make may be subject to similar external public scrutiny, as they have been previously.

Cases from Outside Campus

In addition to the regular caseload of students, faculty members, and staff members that a threat assessment team typically handles, the Virginia Tech Threat Assessment Team has had to address concerning behavior from individuals outside campus, including people who post disturbing writings or videos on the Internet as well as people who visit the university and engage in troubling behavior on campus. Some of these individuals have traveled out of desperation or thoughts of suicide in an effort to see the Virginia Tech memorial. Some of these individuals are eventually reported to the Threat Assessment Team because their behavior on campus raises significant concerns. One case, for example, involved a professor from another university who was suicidal and traveled to Virginia Tech with the plan of killing himself in front of the April 16 memorial. In these types of cases, the Threat Assessment Team is called to evaluate the person and situation and to develop a plan to intervene if necessary, even if the person has no relationship with the university.

Post-4/16 Action Imperative

For Virginia Tech, the mass shooting on April 16, 2007, is not the only violent incident the campus has experienced in recent years. Since that time, several student homicides and suicides have occurred. Shortly after the 2007 mass shooting, a student suicide at Virginia Tech gained wide media coverage. In early 2009, a Virginia Tech graduate student murdered another Virginia Tech graduate student in front of witnesses in the university’s Graduate Life Center. And in the beginning of the 2009-2010 academic year, two Virginia Tech students were murdered in a national forest campground that is approximately 15 miles from the campus. As of this writing, the campground murders have not been solved; nor is it clear if there is any association with the university other than the fact that the victims happened to be Virginia Tech students.

18 E.g., Frueh, B.C., Grubaugh, A.L., Yeager, D.E., & Magruder, K.M. (2009). “Delayed-onset post-traumatic stress disorder among war veterans in primary care clinics.” *The British Journal of Psychiatry*, 194, 515-520.

It is understandable that for some individuals at the university, subsequent violent incidents have rekindled memories of the April 16 shootings. In facing these post-4/16 emergencies, some decision makers have had to negotiate varying levels of anxiety brought on by the need to respond to the emergency. Some university leaders present on campus during the April 16 shootings have expressed feeling significant pressure to “do something” every time a subsequent violent incident has occurred. In contrast, for decision makers who have joined the university since the shootings and may not have felt the sharp nature of the criticism, the need to act may be less acute.

Observations of Threat Assessment Team case discussions suggested a similar “action imperative” on the part of many team members, nearly all of whom were present on campus during the 2007 mass shooting. Team members appeared to focus much of their case discussions on identifying and implementing case management options—on what the team and the university could do to intervene and/or help—before the team had evaluated whether the person of concern posed a threat or not. Recognizing its tendency toward action/intervention, the Threat Assessment Team has since moved toward engaging in more formalized assessments of cases before developing and implementing case management plans.

Summary

As a result of the April 16 mass shootings, Virginia Tech has faced some unique challenges in setting up its threat assessment and case management processes. Recognizing these challenges, Virginia Tech has taken an array of steps to help mitigate their impact. The next chapter will focus on other challenges that Virginia Tech’s Threat Assessment Team face that are more common to institutions of higher education and to campus threat assessment teams generally. It will also include advice and recommendations from Threat Assessment Team members and from Virginia Tech’s leaders on pitfalls that campuses can avoid in setting up a new threat assessment process.

CHAPTER SIX

Potential Pitfalls and Ongoing Challenges

Potential Pitfalls and Ongoing Challenges

Throughout the process of interviewing university leaders and Threat Assessment Team members, those interviewed offered suggestions for institutions of higher education that were considering establishing a threat assessment team or enhancing their existing threat assessment capabilities. These recommendations are captured here in two groupings: (1) pitfalls that Virginia Tech personnel recommend other institutions try to avoid when setting up their threat assessment capacity and (2) future challenges in the field of campus threat assessment in general that may impact any or all institutions of higher education in their efforts to identify and reduce behavioral threats on campus. These suggestions are not intended to be prescriptive but rather are included to provide some guidance and food for thought.

Potential Pitfalls

Complacency

Those involved in building and running Virginia Tech's threat assessment process have noted that it would be easy for a threat assessment team to become complacent, especially when nothing happens. That is, it would be easy for team members to assume that a particular case is not one of concern simply because none of the persons and situations the team has previously addressed turned out to pose a threat or to assume that there was no urgent need to intervene simply because failing to intervene in prior cases had not resulted in any harm or tragedy. Those interviewed stressed the importance for a threat assessment team to remain vigilant and that undergoing periodic tabletop exercises and other types of training could help a team to do so.

Team Name Selection

University leaders noted that it is important for an institution to give careful consideration to the name it gives its threat assessment team. For Virginia Tech, President Steger felt it was important to call its threat assessment team just that: the Virginia Tech Threat Assessment Team. He opted for this name because the specific concept of threat assessment had been advocated so widely in the numerous reports on campus safety released following the Virginia Tech shootings. And once the Virginia legislation was enacted, it required each public

college and university in the commonwealth to establish a “threat assessment team.” President Steger, other university leaders, and Threat Assessment Team members all noted, however, that calling it the “threat assessment team” may concern some people on campus or inadvertently give the impression that the team’s work narrowly focuses only on threats and not more broadly on a wide array of concerning behavior. Other institutions have opted for names such as Student Assistance Team, Person of Concern Team, and Behavioral Assessment Team. University leaders also emphasized that at Virginia Tech, the Threat Assessment Team was but one component of a much larger campus safety enterprise. They cautioned that just having a threat assessment team is not enough and that to be effective, the team should be integrated into a comprehensive campus safety plan.

Critical Question: What should an institution call its threat assessment team?

University Decision: Consistent with the Code of Virginia, Virginia Tech opted to keep the name “threat assessment team” but advises that other names may be preferable for various reasons.

No Silos

Those interviewed all agreed that one of the biggest pitfalls to avoid was to the usual tendency of higher education institutions to operate in information “silos,” with different departments and offices taking steps on their own to handle situations without knowing the bigger picture or factoring in steps that other departments may be taking. One of the most important roles that Virginia Tech envisioned for its threat assessment team was to facilitate information sharing across departments and offices and to break down some of those silos, at least in cases that the Threat Assessment Team would handle.

Ongoing Challenges

Police Involvement on the Team

For Virginia Tech, one ongoing challenge in having the police chief chair the Threat Assessment Team has been the tendency of team members and other university leaders to perceive that the team is

exclusively a law enforcement entity. Team members caution that the police department should not do everything on a threat assessment team, especially when it comes to gathering information about persons or situations of concern. Similarly, those interviewed caution that it is important for all team members to be familiar with relevant state laws governing what information the police department can share with the Threat Assessment Team and include in team records. They noted that team members may be able to access much of that information on their own if it is publicly available (such as state sex offender registry information) and may not have to rely on disclosure from the police department.

The strong association between the police department and the Threat Assessment Team results in having to address concerns about making reports to the team. Faculty and staff members and students need to be reassured that if they call about a person of concern they are not necessarily making a police report or getting themselves or that other person “in trouble.” The association with the police department requires that all members of the team and affiliated offices serve as ambassadors for the team’s interest in early detection and the provision of supportive services to individuals who may benefit.

Counseling Center Involvement on the Team

Involvement of the counseling center director or staff member on the Threat Assessment Team makes good conceptual sense and works well in theory. But in practice, it can be an ongoing challenge. This may be particularly true on campuses like Virginia Tech that are located in rural areas where the surrounding communities are limited in what they might be able to offer in the way of mental health assessment and treatment services. On those campuses, it will likely fall to the counseling center director (or designated staff member) to conduct mandatory assessments of students, faculty, or staff because few other options may be available outside the campus counseling center. In the case of Virginia Tech, the counseling center director is often asked to conduct mandatory assessments, which requires him to assume a different role than he is in when he serves as a patient’s therapist or counselor. The counseling center director has emphasized that when he is asked to conduct a psychological assessment of someone for the

Threat Assessment Team, he has to make it very clear to the person of concern that he is working as an evaluator for Virginia Tech in that situation and not as a therapist. He also must emphasize that anything the person says will not be treated as confidential and must be shared in order for the team and the university to be able to help. When he has followed this process in the case of assessments for students, this approach appears to have worked well as long as the assessor is absolutely clear about whom he/she works for in any given evaluation. The approach has been less clearly effective in the one case of a faculty assessment that the counseling center director was asked to conduct.

Need for Additional Case Management Resources

At the time of this writing,¹⁹ one concept that was being debated at Virginia Tech was whether to create a Care-type team for faculty and staff members in need of assistance. Recognizing the importance of early intervention in preventing harm and self-harm and understanding the need to have an array of intervention resources, Virginia Tech has faced an ongoing challenge in finding and using a variety of resources to support or intervene with faculty and staff members who have raised some concern. The university chose to address this issue by exploring the idea of a provisional Employee Resource Team (ERT) to provide a more formal means to address faculty and staff members who appear to be in crisis or in need of some assistance. Similar to the genesis of Virginia Tech's Threat Assessment Team, the university's ERT would be a more formal version of an informal multi-disciplinary group that already met on a regular basis to discuss concerns related to faculty and staff behaviors. Virginia Tech's senior leaders are still weighing the pros and cons of having an ERT, with no clear consensus yet formed.

Related to this issue has been consideration concerning whether to require or mandate counseling in certain situations. Recently, 80 percent of counseling center directors surveyed from across the United States reported that they do mandatory *assessments*²⁰ of persons of concern, but there are no good data on the percentage that engage in manda-

tory counseling. Like other institutions of higher education, Virginia Tech will have to think through the policies and ethics of mandatory counseling. It is important to note that it is both ethical and acceptable to mandate *counseling* in other arenas, such as in substance abuse and mental health diversion cases where someone who has broken the law (for certain violations where a substance addiction or psychological problem is suspected of playing a role in the crime committed) is ordered by the court to undergo mandatory counseling as a condition for avoiding prison and eventually getting the charges dropped.

Legislative Issues

One final challenge raised by several university leaders was the importance of staying current with developments in the state legislature that could impact the work of an institution's threat assessment team. In Virginia Tech's experience, there was an initial push within the Virginia legislature to require the state's public colleges and universities to include representatives of affected populations (e.g., students, faculty members, staff members) on their threat assessment teams. Most at Virginia Tech were opposed to including such representatives, arguing that doing so could have a chilling effect on the team's ability to discuss confidential information. Through regular contact with their legislators, Virginia Tech officials were able to voice these concerns. Eventually, the Virginia legislature backed away from that requirement. Other issues may arise during the course of a threat assessment team's work, or the team may opt to lobby its state legislature to change laws.

As of this writing, there were three proposals before the Virginia legislature that could impact threat assessment teams at colleges and universities. The first is a proposal that the state's Freedom of Information Act be amended to exclude all records and electronic communications of a threat assessment team from records open to public inspection. The second is a proposal that law enforcement officers, who are members of a threat assessment team, be granted the authority to share certain criminal history information with the team. The third is a proposal that the state legislation on health records privacy be amended to permit mental health professionals who sit on a threat assessment team to have the authority to share relevant information in student records with the team. Good communication

¹⁹ October 2009.

²⁰ Rando & Barr (2009).

with the legislature can help threat assessment teams to stay current with legislative proposals that may impact their work and to help to educate policymakers about additional needs or obstacles.

Summary

In some ways, a threat assessment team’s work is never done. There will always be challenges that can make a team’s work more difficult; however, there are steps that a team can take—and cheerleaders it can recruit to champion its work—to help overcome those obstacles and even make its work more effective. Virginia Tech’s Threat Assessment Team and leaders offered several cautions on pitfalls that can be avoided with some simple advance planning or strategic thinking. They also acknowledge that their work continues, both at the case level and at the higher level, in terms of strategic planning to ensure that their efforts to prevent violence are as effective as possible.

CONCLUSION

Conclusion

April 16, 2007, marked a turning point in campus safety, not only for Virginia Tech, but also for all higher education institutions in the United States (and arguably in some countries outside the U.S. as well). The mass shootings at Virginia Tech prompted tremendous attention and focus on issues of campus security in general and in particular on identifying and intervening with at-risk behaviors in students, faculty members, and staff members. As the attack at Columbine High School served as a wake-up call for K-12 safety and security issues, so, too, has the Virginia Tech attack forced all of us to focus more on campus safety and on violence and suicide prevention. As nearly all the major reports on campus safety released since the Virginia Tech attacks have advocated, higher education institutions are encouraged to develop campus threat assessment teams and devote resources and personnel toward making them work. Fortunately, as Virginia Tech's efforts to institute and sustain a campus threat assessment program have shown us, the task at hand is feasible.

Throughout the time since Virginia Tech experienced its mass shootings, campus personnel and outside experts have worked diligently to create, support, and continue to refine the Virginia Tech Threat Assessment Team and to hone its ability to identify, evaluate, and intervene with persons, situations, and behaviors of concern. The team's development and evolution continue to this day. Virginia Tech leaders, Threat Assessment Team members, and others are quick to point out that they do not see themselves as experts in the field of campus safety or of campus threat assessment. But they recognize that their new identity as the site of the most lethal attack on a U.S. institution of higher education puts them in a unique position as a laboratory of sorts for new developments in the field of campus safety.

The grant from the U.S. Department of Education, Office of Safe and Drug-Free Schools allowed Virginia Tech to embark on a comprehensive effort to identify and address at-risk behavior in their students, faculty members, staff members, and also visitors. This effort included not only establishing, training, and supporting their Threat Assessment Team, but also creating multi-faceted case management services that could serve both Virginia Tech students and employees.

Case management services are at the heart of effective threat assessment and violence prevention efforts. Although much has been written since the Virginia Tech attack about the value of higher education institutions developing threat assessment teams, far less attention has been paid to the value of establishing case management resources and adding full-time case management staff on campus. It is important to note that Virginia Tech leaders, Threat Assessment Team members, and Care Team members alike credit establishing and institutionalizing this case management capacity with allowing Virginia Tech to assist a wide array of persons in need on campus. Our Virginia Tech colleagues suggest that institutions of higher education give serious consideration to adding case management positions to their university rosters when setting up a threat assessment capacity.

As we have documented here, the road to developing a well-functioning threat assessment team is not always easy. But it is doable, especially with persistence and a willingness to continually evaluate and refine the process. As more higher education institutions develop and implement threat assessment teams and as more research is conducted on incidents of campus violence, we will all learn more about what makes for effective campus threat assessment teams and what strategies can raise team functioning to an even higher level. It is our hope that the openness of Virginia Tech in sharing its experience in developing, implementing, and refining its threat assessment process will help add to the knowledge base in the field of campus threat assessment and will enhance campus safety in general.

APPENDICES

APPENDIX A

Virginia Laws

Appendix A: Virginia Laws

CODE OF VIRGINIA REFERENCES

§ 23-9.2:8. Policies addressing suicidal students.

The governing boards of each public institution of higher education shall develop and implement policies that advise students, faculty, and staff, including residence hall staff, of the proper procedures for identifying and addressing the needs of students exhibiting suicidal tendencies or behavior. The policies shall ensure that no student is penalized or expelled solely for attempting to commit suicide, or seeking mental health treatment for suicidal thoughts or behaviors. Nothing in this section shall preclude any public institution of higher education from establishing policies and procedures for appropriately dealing with students who are a danger to themselves, or to others, and whose behavior is disruptive to the academic community.

(2007, c. 705.)

§ 23-9.2:9. Institutional crisis and emergency management plan; review required.

The board of visitors or other governing body of each public institution of higher education shall develop, adopt, and keep current a written crisis and emergency management plan. Every four years, each institution shall conduct a comprehensive review and revision of its crisis and emergency management plan to ensure the plan remains current, and the revised plan shall be adopted formally by the board of visitors or other governing body. Such review shall also be certified in writing to the Department of Emergency Management. The institution shall coordinate with the local emergency management organization, as defined by § 44-146.16, to ensure integration into the local emergency operations plan.

(2008, cc. 450, 526.)

§ 23-9.2:10. Violence prevention committee; threat assessment team.

A. Each public college or university shall have in place policies and

procedures for the prevention of violence on campus, including assessment and intervention with individuals whose behavior poses a threat to the safety of the campus community.

B. The board of visitors or other governing body of each public institution of higher education shall determine a committee structure on campus of individuals charged with education and prevention of violence on campus. Each committee shall include representatives from student affairs, law enforcement, human resources, counseling services, residence life, and other constituencies as needed. Such committee shall also consult with legal counsel as needed. Once formed, each committee shall develop a clear statement of: (i) mission, (ii) membership, and (iii) leadership. Such statement shall be published and available to the campus community.

C. Each committee shall be charged with: (i) providing guidance to students, faculty, and staff regarding recognition of threatening or aberrant behavior that may represent a threat to the community; (ii) identification of members of the campus community to whom threatening behavior should be reported; and (iii) policies and procedures for the assessment of individuals whose behavior may present a threat, appropriate means of intervention with such individuals, and sufficient means of action, including interim suspension or medical separation to resolve potential threats.

D. The board of visitors or other governing body of each public institution of higher education shall establish a specific threat assessment team that shall include members from law enforcement, mental health professionals, representatives of student affairs and human resources, and, if available, college or university counsel. Such team shall implement the assessment, intervention, and action policies set forth by the committee pursuant to subsection C.

E. Each threat assessment team shall establish relationships or utilize existing relationships with local and state law enforcement agencies as well as mental health agencies to expedite assessment and intervention with individuals whose behavior may present a threat to safety.

(2008, cc. 450, 533.)

§ 23-9.2:11. First warning and emergency notification system required.

By January 1, 2009, the governing boards of each public institution of higher education shall establish a comprehensive, prompt, and reliable first warning notification and emergency broadcast system for their students, faculty, and staff, both on and off campus. Such system shall be activated in the case of an emergency and may rely on website announcements; e-mail notices; phone, cellular phone, and text messages; alert lines; public address systems; and other means of communication. In addition, each institution shall designate individuals authorized to activate the warning system and provide such individuals with appropriate training for its use.

(2008, cc. 413, 450.)

ADDITIONAL VIRGINIA STATE LAWS (went into effect 7/1/2008)

- » HB 559 Emergency custody orders, temporary detention orders, and involuntary commitment; criteria: <http://leg1.state.va.us/cgi-bin/legp504.exe?ses=081&typ=bil&val=hb559>
- » HB 1005 Higher educational institutions; notification to parent of mental health treatment for student: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+HB1005>
- » SB 539 Higher educational institutions; board of visitors, etc. to establish violence prevention committee: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+SB539>
- » SB 636 Higher educational institutions; requesting complete student record from high school: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+sb636>
- » HB 1449/ SB 256 Public institutions of higher education; crisis and emergency management plans: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+SB256>
- » HB 576 Mental health records; health provider shall disclose information to provide care, etc. of minor: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+HB576>

- » HB 499/ SB 246 Involuntary commitment; establishes new standard for outpatient commitment: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+HB499>
- » HB 1058 Higher educational institutions; release of educational records: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+HB1058>
- » HB 583 Emergency custody orders; extension of time: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+HB583>
- » SB 141 State hospitals; discharge plans upon release: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+SB141>
- » HB 709/ SB 226 Firearms; answering mental health questions on consent form required when purchasing, etc.: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+SB226>
- » HB 815 Voluntary admission; report to Central Criminal Records Exchange: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+bil+HB0815>
- » SB 216 Voluntary admission; report to Central Criminal Records Exchange: <http://leg1.state.va.us/cgi-bin/legp504.exe?081+sum+SB216>

Appendix B

Sample Policies

Appendix B: Sample Policies

Campus and Workplace Violence Prevention Policy

www.policies.vt.edu/5616.pdf

Virginia Polytechnic Institute and State University No. 5616 Rev.: 2

Policy and Procedures Date: March 19, 2008

Subject: Campus and Workplace Violence Prevention Policy

1. Purpose

It is the intent of Virginia Polytechnic Institute and State University to provide a safe and secure environment for university employees, students, and visitors by establishing preventative measures, holding perpetrators accountable, and providing assistance and support to victims. This policy specifically addresses the university's position on the prevention, reduction, and management of violence to provide a safe working and learning environment for our students, employees, and visitors at all university owned, controlled, or leased properties, including satellite locations. In implementing this policy, the university is guided by the Commonwealth of Virginia's Policy 1.80 Workplace Violence and Policy 2.30 Workplace Harassment. The conduct of students is covered, in depth, by the University Policies for Student Life. The Division of Student Affairs, Office of Judicial Affairs is responsible for the implementation of the UPSL. Nothing in this policy amends the University Policies for Student Life.

2. Policy

Virginia Tech does not tolerate acts of violence or hostility committed by or against employees, students, contractual workers, temporary employment agency workers, volunteers, visitors, or other third parties on university owned, controlled, or leased properties, or while conducting university business at any location, including representing the university at conferences or off-site meetings, or riding in university owned or leased vehicles. This policy applies to the personal conduct of an employee while functioning in the course and scope of employment, whether on or off campus, and to any off-duty violent conduct that adversely impacts a university employee's ability to perform his or her assigned duties and responsibilities. The personal conduct of

students involving violations occurring off university property will be addressed under University Policies for Student Life if university officials decide that university interests are involved. Student employees, including graduate students with assistantships, may also be covered under relevant employee policies.

It is intended that all useful management strategies be employed to identify and prevent incidents of workplace and campus violence, reduce the effects of violence on victims, and provide consequences to those who threaten or perpetrate violence. University managers, employees, and students are responsible for reporting indications of possible hostile behavior and must not be subjected to any acts of retaliation for reporting concerns. The university will use available resources such as the Employees Assistance Program, law enforcement offices, the university's Women's Center, relevant offices within the Division of Student Affairs, and applicable human resources and student programs and policies in responding to alleged acts of violence.

2.1 Prohibited Conduct and Sanctions

Violence includes, but is not limited to, intimidation, threats, physical attack, domestic and dating violence, stalking, or property damage and includes acts of violence committed by or against university employees, students, contractual workers, temporary employment agency workers, customers, relatives, acquaintances, or other third parties on university facilities. Prohibited conduct includes, but is not limited to, intentionally

- » Injuring another person physically;
- » Engaging in verbal or physical behavior that creates a reasonable fear of injury to an identifiable person;
- » Engaging in verbal or physical behavior that subjects an identifiable individual to extreme emotional distress;
- » Engaging in threatening or violent behavior based on race, ethnicity, gender, sexual orientation, or other protected status;
- » Defacing or damaging property;

- » Threatening to injure an individual or to damage property;
- » Committing injurious or threatening acts related to sexual assault, stalking, dating or domestic violence, or sexual harassment;
- » Brandishing a weapon or firearm; and
- » Retaliating against any individual who, in good faith, reports a violation of this policy.

Verbal behavior also includes use of any method of communication such as e-mail, comments posted on websites, or other paper or electronic media. A violation of this policy shall be considered unacceptable conduct and subject to the disciplinary actions under the appropriate faculty, staff, and student policies, up to and including dismissal.

- » University staff and classified employees are subject to disciplinary action as outlined in the Commonwealth of Virginia Standards of Conduct and Performance Policy 1.60.
- » University faculty members are subject to disciplinary review as outlined in the Faculty Handbook or Research Faculty Handbook.
- » Hourly and wage employees, including adjunct faculty, are "at will" employees and may be disciplined or dismissed.
- » Undergraduate and graduate students are subject to disciplinary actions as outlined in the University Policies for Student Life.

Individuals who violate this policy may also be subject to arrest for trespass and/or violation of the appropriate state criminal statute and/or may be barred from campus. For employees, an act of off-duty violent conduct may be grounds for disciplinary action, up to and including dismissal per applicable personnel policies.

2.2 Prohibition of Weapons

The university's employees, students, and volunteers, or any visitor or other third party attending a sporting, entertainment, or educational event, or visiting an academic or administrative office building, dining facility, or residence hall, are further prohibited from carrying, main-

taining, or storing a firearm or weapon on any university facility, even if the owner has a valid permit, when it is not required by the individual's job or in accordance with the relevant University Policies for Student Life. Any such individual who is reported or discovered to possess a firearm or weapon on university property will be asked to remove it immediately. Failure to comply may result in a student judicial referral and/or arrest or an employee disciplinary action and/or arrest.

2.3 Authorized Exceptions to Prohibition on Possession of Firearms or Weapons

An employee may possess a firearm or weapon if it is

- » Used by an employee who is a certified law enforcement officer employed by the Virginia Tech Police Department;
- » Required as a part of the employee's job duties with the Commonwealth of Virginia; or
- » Connected with training received by the employee in order to perform the responsibilities of their job with the university.

Employees and students may possess and use appropriate tools, such as saws, knives, and other such implements, necessary for the performance of their job duties or school work, or for student recreational purposes approved under University Policies for Student Life. Certain agricultural workers have been authorized to use firearms, and hunting on university property may be authorized by the appropriate university officials. Some employees reside in university-owned houses and are permitted to keep personal firearms on these premises; however, this exception does not extend to employees living in university residence halls. As stated in the University Policies for Student Life, students may not possess, use, or store firearms or weapons on university property; however, firearms and other weapons may be stored with the Virginia Tech Police Department to be checked out for use off campus. Organizational weapons of the Virginia Tech Corps of Cadets, approved by the commandant, are not prohibited by this policy. Other exceptions must be approved by the vice president for administrative services, in consultation with appropriate university offices.

2.4 Prevention, Risk Assessment, and Response

As part of a larger and institution-wide commitment to a safe campus and workplace environment, the university is committed to the development of preventative measures, including a campus and workplace violence prevention and risk assessment committee, security planning for at-risk individuals, pre-employment screening, and general programs to increase employee and student awareness. The vice president for administrative services will chair a campus-wide Workplace Violence Prevention and Risk Assessment Committee, which will be appointed by the president and will be responsible for

- » Conducting an annual review to identify potential or existing risks, including gathering and analyzing reports and data to identify high-risk departments, activities, or locations;
- » Recommending and implementing employee and student awareness and training programs on campus and workplace violence;
- » Implementing plans and protocols for responding to credible threats and acts of violence (crisis management plan);
- » Reviewing and developing threat assessment and response policies and procedures;
- » Reviewing periodic summary reports from Student Affairs, campus police, Human Resources, and other offices;
- » Communicating internally with employees and students; and
- » Evaluating the effectiveness of the university's workplace/campus violence prevention programs.

2.4.1 Threat Assessment Team

The president will appoint a Threat Assessment Team and its chair. The team will include representatives from the Virginia Tech Police Department, Academic Affairs, Student Affairs, and Human Resources and a clinical psychologist from the University's Counseling Center. Legal counsel will serve as an advisor to the Threat Assessment Team. The team is charged with developing comprehensive fact-based assess-

ments of students, employees, or other individuals who may present a threat to the university and is empowered to take timely and appropriate action, consistent with university policy and applicable law.

2.5 Identifying and Reporting Risks

All individuals are encouraged to be alert to the possibility of violence on the part of employees, former employees, students, customers, and strangers. Employees and students shall place safety as their highest concern and shall report all acts of violence and threats of violence. All reports of violence will be handled in a confidential manner, with information released only on a need-to-know basis within the campus community and in accordance with federal and state laws and regulations. Management shall be sensitive and responsive to the potential for fear of reprisal by employees or students who report threats or acts of violence. This policy prohibits retaliation against any person who, in good faith, reports a violation of this policy. Every effort will be made to protect the safety and anonymity of anyone who comes forward with concerns about a threat or act of violence.

2.6 Responsibilities

It is the responsibility of every administrator, faculty member, staff member, and student to take any threat or violent act seriously and to report acts of violence or threats to the appropriate authorities as set forth in this policy. Department heads, directors, and supervisors are also responsible for communicating the policy to all employees under their supervision, ensuring that facilities are as safe as feasible, identifying and providing violence prevention training to employees as appropriate, and ensuring that all employees are aware of how to report potential threats. The Virginia Tech Police Department will coordinate all university action in case of a violent incident on campus or in the work place, establish and publish procedures for campus and workplace violence prevention and threat assessment, and investigate threats or incidents of violence. Only the Virginia Tech police or other law enforcement agencies should attempt to apprehend the alleged offender. Human Resources will coordinate employee-related preventive measures, including conducting criminal conviction checks in accordance with university policy, providing awareness programs to new employees, coordinating referrals to the employee assistance program, advising em-

ployees and managers, making referrals to the Threat Assessment Team and providing case management, and coordinating with other university and community resources to support victims of violence.

Student Affairs will coordinate student-related preventive measures including training for professionals, student employees (e.g., residence advisors), and students through the on-call process and through other education and training methods. The Office of Judicial Affairs is responsible for responding to and adjudicating violations of the University Policies for Student Life. Student Affairs will maintain the Care Team, the goal of which is to coordinate support services and administrative response to crises involving students, make referrals to the Threat Assessment team, and provide case management. The Office of Emergency Management (OEM) will develop and coordinate the university's emergency response plan, advise departments on the development of unit plans, provide templates to support the development of departmental plans, and coordinate emergency preparedness training for university administrators and departments in partnership with Student Affairs, University Relations, Virginia Tech Police Department, Environmental Health and Safety, Human Resources, and other offices. OEM will develop a plan for awareness and training programs for employees and students. The Virginia Tech Women's Center will respond to requests for assistance from staff, student, and faculty victims of violence or threats of violence by providing counseling, advocacy, safety planning, and other support as needed to victims of sexual assault, rape, dating or domestic violence, or other forms of campus or workplace violence. The center will coordinate services with on- and off-campus partners such as the Virginia Tech Police Department and other law enforcement agencies, the court system, the on-campus judicial process, medical and hospital services, and shelter services.

3. Procedures

3.1 Reporting Incidents

Any individual who believes there is an immediate danger to the health or safety of any member of the university community should call the Virginia Tech Police Department at 911. General questions about the Campus and Workplace Violence Prevention Policy should be directed to the Office of Emergency Management or the Virginia

Tech Police Department. Questions about specific issues may also be directed to

- » Occupational Safety Division (EHSS) 540/231-5985
- » Human Resources 540/231-9331
- » University Legal Counsel 540/231-6293
- » Virginia Tech Police Department 540/231-6411
- » Virginia Tech Women's Center 540/231-7806
- » Office of Judicial Affairs 540/231-3790
- » Dean of Students Office 540/231-3787

3.2 Support for Victims of Violence

The university shall make efforts to provide a campus and workplace free from violence and to protect and support victims and those threatened or exposed to acts or threats of workplace violence by offering security measures and identifying appropriate resources for providing support and assistance. Victims may also need special accommodations or adjustments to their work or class schedule, location, or working conditions in order to enhance their safety. The university shall accommodate these requests and needs whenever possible and appropriate.

3.3 Security Planning for Potentially At-risk Employees and Students

Some employees can be at risk for violence/hostility because of the nature of their jobs. Other employees or students can be at risk because they are subject to violence, threats, or harassment from a current or former spouse or partner or other non-employee. The Virginia Tech Police Department, Human Resources, the Women's Center, and other offices will work with at-risk students, and employees and their supervisors, to develop safety plans that address the specific risks they face.

3.4 Pre-employment Screening and Criminal Conviction Checks

Human Resources administers the university's Policy 4060 Criminal Conviction and Drivers' Records and will work with hiring managers to ensure that sensitive positions are identified and criminal conviction checks conducted in accordance with the policy. Hiring managers are responsible for conducting pre-employment reference checks and advising Human Resources when potential problems are identified.

4. Definitions

An **at-risk individual** is defined as an employee, student, or other person who is a potential target or victim.

Assault is committed when one person 1) tries to or does physically strike another or 2) acts in a threatening manner to put another in fear of immediate harm. Aggravated assault is defined as a completed or attempted attack with a weapon and an attack without a weapon in which the victim is seriously injured.

Campus is defined as any location, either permanent or temporary, owned or leased by Virginia Tech. This includes, but is not limited to, the buildings, grounds, and the surrounding perimeters, including the parking lots, field locations, classrooms, residence halls, and alternate work or class locations.

A **credible threat of violence** is defined as a knowing and willful statement or course of conduct that would cause a reasonable person to believe that he or she is under threat of death or serious bodily injury. A course of conduct is any series of acts over a period of time, however short, that evidences a continuity of purpose, such as following or stalking an individual to or from the workplace/campus, telephone calls to the employee or student, and correspondence with the employee or student, whether by public or private mail, e-mail, interoffice mail, or fax.

Employee, for purposes of this policy, is defined as any salaried or wage faculty or staff member, graduate students paid on assistantships, and student workers.

Firearms are defined as any gun, rifle, pistol, or handgun designed to fire bullets, BBs, pellets, or shots, including paint balls, regardless of the propellant used.

Intimidation is engaging in actions that include, but are not limited to, stalking or behavior intended to frighten, coerce, or induce duress.

Physical Attack is unwanted or hostile physical contact such as hitting, fighting, pushing, shoving, or throwing objects.

Property Damage is intentional damage to property and includes property owned or leased by the university, employees, students, volunteers, visitors, or vendors.

Sexual assault is defined as any forcible sexual activity that occurs without the consent of the victim. It includes, but is not limited to, unwanted kissing and fondling; forcible vaginal, oral, or anal intercourse; and forcible penetration with an object or finger. Consent is an agreement reached without force, coercion, or intimidation between persons. Forcible sexual activity occurs when consent is not reached or when the victim is mentally incapacitated or physically helpless.

Stalking is defined as repeatedly contacting another person when the contact is unwanted. Additionally, the conduct may cause the other person reasonable apprehension of imminent physical harm or cause substantial impairment of the other person's ability to perform the activities of daily life. Contact includes but is not limited to communicating with (either in person, by phone, or by computer) or remaining in the physical presence of the other person.

Student is defined as any individual who has accepted an offer of admission as an undergraduate, graduate, or professional student and who has not yet graduated or officially transferred to another institution. If a student's enrollment lapses for more than one calendar year, the student will no longer be subject to disciplinary action under this policy.

Student employee is defined as any work-study student, student wage employee, or graduate student paid on an assistantship on the university payroll.

Third Parties are individuals who are not state employees or students, such as relatives, acquaintances, contractual workers, vendors, visitors, volunteers, customers, clients, or strangers.

Threat is the expression of intent to cause physical or mental harm. An expression constitutes a threat without regard to whether the party communicating the threat has the present ability to carry it out, and without regard to whether the expression is contingent, conditional, or future.

University facilities are any location, either permanent or temporary, owned or leased by Virginia Tech. This includes, but is not limited to, the buildings, grounds, and the surrounding perimeters, including the parking lots, field locations, classrooms, alternate work or class locations, and university owned or leased vehicles.

Victim is defined as an individual who has experienced or witnessed an act or acts of violence or threats of violence as outlined in this policy.

Violence includes, but is not limited to, intimidation, threats, physical attack, domestic violence, or property damage and includes acts of violence committed by university employees, students, clients, customers, relatives, acquaintances, or strangers against university employees in the workplace but does not include lawful acts of self-defense or the defense of others.

Weapons are defined as any instrument of combat or any object not designed as an instrument of combat but carried for the purpose of inflicting or threatening bodily injury. Examples include, but are not limited to, firearms, knives with fixed blades or pocket knives with blades longer than four inches, razors, metal knuckles, blackjacks, hatchets, bows and arrows, nun chahkas, foils, or any explosive or incendiary device.

Workplace is any location, either permanent or temporary, where an employee performs any work-related duty. This includes, but is not limited to, the buildings and the surrounding perimeters, including the parking lots, field locations, classrooms, alternate work locations, and travel to and from work assignments. It further includes university owned or leased vehicles.

Presidential Policy Memorandum 251 (see images of original two-page memo on pages 86 and 87); retrieved from www.policies.vt.edu/policies/memos/ppm251.pdf



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PRESIDENTIAL POLICY MEMORANDUM NO. 251

TO: All Virginia Tech Employees and Students

FROM: Charles W. Steger 

DATE: January 31, 2008

SUBJECT: Appointment of a University Threat Assessment Team

Approved by the President: December 10, 2007
 Effective Date: Immediately
 Expiration Date: Indefinite

Background

Following the tragic events of April 16, 2007, several reports were issued by Governor Kaine's independent Virginia Tech Review Panel and the three internal review committees that I appointed, which included recommendations for the designation of teams and/or advisory committees relating to violence prevention and/or response. In June 2005, the Virginia Tech Board of Visitors had approved the Campus and Workplace Violence Prevention Policy (Policy 5616), and in July 2005 a Campus Workplace Violence team was subsequently established. However, the Governor's Panel Report recommended specifically that all institutions for higher learning in Virginia have a threat assessment team that includes representatives from law enforcement, human resources, student affairs, academic affairs, legal counsel, and mental health functions.

For several months following the April 16 tragedy, the university had an ad hoc committee functioning as a threat assessment team. At my request, David Ford, Vice Provost for Academic Affairs, in consultation with Provost staff, Student Affairs, Police and Legal Counsel, subsequently developed a proposal for a formal threat assessment team structure. At the December 10, 2007 Policy Group meeting, the Policy Group reviewed and I approved the proposal to establish a single university threat assessment team that would serve both students and university employees.

Composition and Charge of the Threat Assessment Team

Listed below are the positions that I have named to the Threat Assessment Team and the incumbents in those positions. The Chief of the Virginia Tech Police Department serves as the Chair of the Team.

- Chief of Police (Team Chair) – Wendell Flinchum
- Dean of Students - Tom Brown
- Human Resources Representative – Pat Burton
- Student Affairs Representative – Rick Ferraro
- Clinical Psychologist Representative – Chris Flynn
- Academic Affairs Representative – David Ford
- Legal Counsel Representative – Kay Heidebreder
- Student Affairs Representative – Ed Spencer

Requests may be made to the President to adjust the permanent membership of the committee in the future if necessary. Also, when warranted for individual cases, the chair may request additional representatives from the Graduate School, Cranwell International Center and/or other university colleges/departments.

The Threat Assessment Team serves both students and employees and is charged with the task of convening, assessing the situation at hand, and taking immediate preventative action when a threat of imminent danger exists. The Team has full authority to act on behalf of the university and shall report all actions to me. The Team will proceed immediately to review existing teams at peer institutions, to establish team protocol, and to define and schedule appropriate team training. The Team will have read-only access to the CARE team electronic database, which shall be the sole repository for comprehensive information on at-risk students.

I greatly appreciate those appointed to the Threat Assessment Team serving the university in this important role.

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University Student Conduct System & Interim Suspension Policy

www.hokiehandbook.vt.edu/conductsystem

Interim Suspension Policy

The university retains the authority to impose an interim (immediate) suspension if such action is necessary to preserve the safety of persons or property. In this instance, the students will be afforded an interim suspension hearing and the opportunity to show why their continued presence on campus does not constitute a threat to themselves, others, or property. The interim suspension hearing is separate from a formal student conduct hearing. A formal student conduct hearing will be provided as soon as possible.

Students may be intermily suspended from the university or selected campus facilities with proper notice. The following steps explain the procedure for imposing an interim suspension:

1. When a situation, as defined above, occurs, the responding university official contacts the dean of students or his/her designee to assess the situation. If the situation is sufficiently serious, the dean of students, in consultation with others, can determine if an interim suspension hearing is necessary.
2. The interim suspension hearing will be held as quickly as possible and will be presided over and a decision rendered by the associate vice president for student affairs or his/her designee. The student, the responding university official, and other witnesses, as deemed appropriate by the dean of students or the associate vice president for student affairs, will attend the hearing. If the student is unable or unwilling to attend the hearing, depending upon the circumstances, the hearing may proceed without the student. During the hearing, the student will be given an opportunity to demonstrate why his or her continued presence on campus does not constitute a threat to himself or herself, others, or property. As part of the hearing, the student may be required to submit to an immediate medical/psychological evaluation. The evaluation may include a 24-hour period of observation. The student will be evaluated by the director

of the Cook Counseling Center or his/her designee. Results of this evaluation will be shared with the appropriate university officials. Agreeing to this evaluation does not preclude interim suspension, additional disciplinary action, or a decision to impose a medical withdrawal from the university. If the student agrees to an evaluation, the interim suspension may be delayed until the evaluation is completed.

3. Based on the outcome of the interim suspension hearing and/or the evaluation, the student may be suspended from the university, medically withdrawn, and/or banned from selected campus facilities until a formal student conduct hearing can be convened. If a student is suspended, he or she will receive written notice of this decision by the associate vice president for student affairs or his/her designee. If intermily suspended, the student will be escorted out of the facility and/or off campus by a Virginia Tech police officer. The decision of interim suspension will be final. There will be no appeal.
4. The outcome of the interim suspension hearing will be shared with the Office of Student Conduct which will schedule, as soon as possible, a formal student conduct hearing to determine the final consequences of the initiating inappropriate behavior.

University Safety & Security Policy Structure

Virginia Polytechnic Institute and State University No. 5615 Rev.: 5
Policy and Procedures Date: February 27, 2009

Subject: University Safety and Security

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1. Purpose

Virginia Polytechnic Institute and State University (Virginia Tech) is committed to the safety and welfare of students, faculty, staff and visitors through the establishment of reasonable practices that (1) support a safe and secure environment in all buildings and grounds owned, leased, and/or operated by Virginia Tech; (2) promote safety through policies and programs; (3) provide an appropriate level of security at university activities; and (4) safeguard the university's property and physical assets. The University Safety and Security Policy

provides an overview of existing university safety and security policies and programs that demonstrate compliance with Sections 23-9.2:9-11 of the Code of Virginia and the Higher Education Act of 1965 as amended. This policy describes the authorities and responsibilities to carry out programs and operations that promote safety and security of individuals and property and establishes an operational committee for coordination and oversight of university safety and security policies and procedures. The policy also defines the specific responsibilities of the Virginia Tech Police Department (VTPD) and other university offices with responsibilities for campus safety and security, including compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act.

2. Policy

The university is committed to promoting the safety and security of the Virginia Tech community within a supportive and accessible living, learning, and working environment. It is further committed to safeguarding physical resources, identifying conditions or circumstances that may pose risks to the safety and security of the university, and preparing the university to effectively respond to emergencies.

University facilities must be used in a safe and appropriate manner so as not to endanger the university community or the general public. All faculty, staff, students, and other members of the Virginia Tech community share responsibility for the safety and security of the institution and must conduct university activities and operations in compliance with applicable federal and state regulations and university policies.

2.1 Authorities and Responsibilities

By state statute, the Virginia Tech Board of Visitors is charged with the care, preservation, and improvement of university property and with the protection and safety of students, faculty, and staff on university property. As part of an institution-wide commitment to a safe and secure campus, the university has established offices specifically charged with security and safety responsibilities and created a committee structure to provide general oversight and leadership for the university's security, safety, and violence prevention efforts.

2.1.1 Committee Structure

Safety and Security Policy Committee: The University Safety and Security Policy Committee is an operational committee appointed by the president to serve as a coordinating and policy body, with responsibilities for establishing the framework for an overarching university safety, emergency management, and security program for all Virginia Tech facilities (on and off campus, owned, and leased) and ensuring that it is implemented through the appropriate offices; evaluating the overall safety and security infrastructure; and providing oversight to the work of university operational committees responsible for environmental health and safety, violence prevention, emergency management, and other safety and security related efforts. The committee also serves as the Emergency Response Policy Group as defined in Virginia Tech's Emergency Response Plan. The members of the committee will hold senior administrative roles with the authority to make policy decisions and commit resources in the core operational areas that are generally responsible for the safety and security of the campus community. The committee is chaired by the president; in the president's absence, the committee is chaired by the vice president for administrative services. University legal counsel will serve as an advisor to the committee. Specific committee responsibilities include

- » Reviewing, evaluating, and determining requirements concerning safety and security assessments, plans, programs, and education, including changes that may affect the quality of the university's living, learning, and working environment;
- » Overseeing reviews of the university's assessment of vulnerabilities, hazards, and risks related to the safety and security of individuals and the physical campus;
- » Ensuring that sufficient university resources and funding are available to perform necessary emergency management, safety, and security functions and that these resources are consistent with anticipated regulatory changes;
- » Overseeing the education and prevention of violence on campus in accordance with Section 23-9.2:10 of Code of Virginia, including providing direction to the Campus and Workplace Violence

Prevention Committee and the Threat Assessment Team on the development and implementation of violence prevention policies, procedures, education, and guidance regarding recognition and reporting of individuals whose behavior may pose a threat, assessment of such individuals, and means of action to resolve potential threats;

- » Overseeing the Safety and Security Policy and other policies that have implications for emergency management, safety, and security, including, but not limited to, facilities use, sponsorship of entertainment and events, threatening or intimidating conduct, facilities access control, environmental health and safety, and violence prevention;
- » Reviewing and establishing guidelines and standards for departmental emergency response and continuity of operations plans;
- » Evaluating the effectiveness of the university's safety and security plans and programs; and
- » Advising the president on safety and security issues.

Threat Assessment Team: The Threat Assessment Team, established by the president through President's Policy Memorandum #251 (Appointment of a University Threat Assessment Team) in accordance with Section 23-9.2:10 of the Code of Virginia, serves the entire university community, including visitors and guests. The team reports to the Safety and Security Policy Committee, which is chaired by the president and is responsible for implementing assessment, intervention, and action policies to assess individuals whose behaviors may present a campus threat. **Campus and Workplace Violence Prevention Committee:** The Violence Prevention Committee is an operational committee established by university Policy 5616, Campus and Workplace Violence Prevention, and is one of the components of the violence prevention committee structure approved by the board of visitors in accordance with the provisions of Section 23-9.2:10 of the Code of Virginia. The committee is appointed by the vice president for administrative services and reports to the Safety and Security Policy Committee. It is charged with education and prevention of violence on campus and is

responsible for developing and implementing threat assessment; violence prevention; and education procedures, programs, and guidance. The committee has oversight responsibilities for university compliance with Policy 5616, Campus and Workplace Violence Prevention. **Health and Safety Committee:** The Health and Safety Committee is an operational committee established by university Policy 1005, Health and Safety, with the authority to oversee university compliance with health and safety policies. The committee is appointed by the vice president for administrative services and reports to the Safety and Security Policy Committee. **Emergency Management and Risk Assessment Committee:** The Emergency Management and Risk Assessment Committee is an operational committee, appointed by the vice president for administrative services and reporting to the Safety and Security Policy Committee. It is responsible for oversight of emergency management and risk assessment activities, programs, and initiatives. The committee will continually evaluate the needs of the university, developing appropriate planning, programmatic response, and mitigation strategies designed to reduce risks and to continually improve the disaster resiliency of Virginia Tech.

2.1.2 Virginia Tech Departments and Offices with Safety and Security Responsibilities

The university's commitment to the safety and welfare of the university community is demonstrated by an organizational and programmatic structure that defines the authorities and responsibilities of university departments to carry out programs and operations that promote the safety and security of individuals and property. Major units reporting to the vice president for student affairs and the vice president for administrative services provide related support functions and direct services. The Office of Research Compliance, reporting to the vice president for research, oversees university community compliance with applicable laws, regulations, and guidelines associated with research and teaching. Those departments with primary safety and security roles are described below. **Virginia Tech Police Department (VTPD):** The VTPD is a full-service, nationally accredited law enforcement agency empowered by the Code of Virginia to enforce federal, state, and local laws; to make arrests; conduct criminal investigations; and perform other law enforcement activities. VTPD has concurrent

jurisdiction in designated areas with law enforcement agencies in Montgomery County and the towns of Christiansburg and Blacksburg and has the same authority as law enforcement agencies in the county and towns. The VTPD's Directives Manual delineates the character of working relationships with other law enforcement agencies. The VTPD responds to and investigates alleged criminal offenses on property owned or leased by the university. The university, through its police department, monitors and records student off-campus criminal activity, including student organizations with off-campus housing, by communicating and assisting local law enforcement, as needed. The annual crime statistics report required by the Clery Act is published by the VTPD (see section 2.2.1 Federal Directives). The VTPD is responsible for implementing and administering any security policy or procedure that is on university property.

Offices of Housing & Dining Services and Residence Life: The Offices of Housing & Dining Services and Residence Life in Student Affairs allocate resources necessary to ensure the safety and security of campus residence halls. Resident advisors will be trained to be security conscious and should be alert to propped security doors, acts of vandalism, and unauthorized guests. Resident advisors are also trained to perform safety audits of residence rooms, coordinate emergency evacuation and warning procedures, and facilitate the performance of fire and other drills. **Women's Center:** The Women's Center is the primary department that provides crisis intervention, counseling, and advocacy services to students, faculty, and staff who have been affected by sexual assault, relationship violence, stalking, cyberstalking, and harassment. The Women's Center is also responsible for providing outreach and education to the campus community on violence against women issues and reviewing campus policies related to these issues. The Women's Center provides anonymous information to the Virginia Tech Police Department on crimes that occur on campus or off campus in a facility owned or operated by a registered student organization that have not been reported to the Office of Judicial Affairs. **Office of Insurance and Risk Management:** The Insurance and Risk Management Office handles all insurance matters, including claims and liability risk evaluations for university activities. It provides evaluation and training in risk management and insurance on behalf of Virginia Tech and

its corporations. It has specific responsibility for current property and casualty insurance policies and coverage for Virginia Tech property and automobiles. It has further responsibility to administer the property, general liability, automobile, boiler and machinery, medical malpractice, and related insurance programs of Virginia Tech and associated claims. Environmental Health and Safety Services (EHSS): EHSS develops policies, programs, and training to support university compliance with federal and state laws, regulations, and standards. EHSS supports university efforts to identify, evaluate, and control hazards, including environmental monitoring services, waste disposal, industrial hygiene monitoring, and the evaluation and management of potential health and safety hazards. EHSS evaluates safety risks and provides training to faculty, staff, and students to reduce the risk of accident, injury or illness, fires, hazardous materials incidents, and laboratory accidents. The EHSS department also collects statistics for the annual fire safety report provided as part of the police department's annual report (see section 2.2.1 Federal Directives). Office of Emergency Management (OEM): The Office of Emergency Management is responsible for the implementation and coordination of emergency management efforts for the university, including developing, testing, and maintaining the university's hazard mitigation, emergency preparedness, and continuity of operations plans. Additional responsibilities of OEM include scheduling and coordinating tests of emergency response and evacuation procedures on an annual basis; activating and coordinating the university's emergency operations center; developing protocols and procedures relating to emergency management; designing and coordinating training and exercises; serving as a liaison with federal, state, and community emergency organizations; creating a comprehensive emergency preparedness and response communications and awareness program for employees and students; and coordinating and guiding the efforts of employees who are assigned unit emergency management responsibilities. OEM will work with Police, Environmental Health and Safety, Facilities, and other offices to coordinate risk, safety, and security assessments of campus facilities and programs and will provide reports and recommendations to management and the University Safety and Security Policy Committee. Internal Audit: The Internal Audit Department reviews access control/key control and

limited aspects of physical security and health and safety as part of its risk-based audits and compliance reviews to ensure that the auditee department is in compliance with the university, state, and/or federal regulations. Any audit findings and recommendations are addressed directly to the auditee and may be included in the audit report, which is submitted to and reviewed by the board of visitors.

2.1.3 Departmental and Individual Responsibilities

Departmental responsibilities: Directors/department heads, and individuals in supervisory roles are responsible for ensuring that personnel within their departments are aware of safety and security policies and the procedures for reporting safety problems, accidents, emergencies, crimes, and threats. They are also responsible for ensuring that emergency preparedness and continuity of operations plans are developed in accordance with university guidelines and communicated to all personnel in order to ensure familiarity with and coordination between departmental personnel and emergency responders. In compliance with the university's Emergency Response and Continuity of Operations plans, departments are responsible for developing internal procedures to communicate with members of their departments. Departmental supervisors are responsible for implementing security and safety policies and programs in work areas under their supervision/control. **Individual responsibilities:** Individuals are responsible for being aware of and complying with university policies and procedures, and applicable law. Employees and students also have an obligation to accurately and promptly report crimes, emergencies, potential threats, or risks to the appropriate university office(s). Numerous employee and student policies outline responsibilities and acceptable behavior, and standards of conduct. Violations of university policy are subject to the disciplinary actions under the appropriate faculty, staff, and student policies, up to and including dismissal. The conduct of students is covered, in depth, by the University Policies for Student Life. Each fall semester, employees and students are made aware of safety and security policies and procedures through the "Annual Notice on Community Standards – Health, Safety, and Security" that is e-mailed by Student Affairs, Human Resources, and the Virginia Tech Police Department to all members of the university community.

2.2 Federal and State Directives and University Policies

In addition to a strong campus law enforcement program, the university has implemented a number of measures that comply with federal and state directives to promote campus safety and security.

2.2.1 Federal Directives

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act): The Clery Act defines the specific responsibilities for colleges and universities to make the campus community aware of crimes that have occurred and necessitate caution on the part of students and employees, and for providing annual reports on campus crime statistics. As required by the act, “immediate notifications” will be provided to the community in the event that a situation arises, either on campus or off, that, in the judgment of the chief of the VTPD, constitutes an ongoing or continuing threat. Section 2.4.2 of this policy describes the methods used to provide emergency notifications. The warning may be issued through the use of a variety of sources, which may include, but are not limited to, VT Alerts, the university e-mail system, posters, university website, or phone mail systems. Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the community and individuals, University Relations may also post a notice on the Virginia Tech homepage or utilize the VT Alerts automated notification system.

The chief of the VTPD will be responsible for publishing annual crime statistics as required by the Clery Act, as well as the number of arrests and judicial referrals for alcohol, drug, and weapons violations. Annual statistics on hate crimes will also be published for larcenies, vandalisms, simple assaults, and intimidation, as well as any other crime involving bodily injury to a person in which the victim is intentionally selected because of the actual or perceived gender, religion, sexual orientation, ethnicity, or disability. The chief of the VTPD must also publish and make generally available to all current students and employees an annual report of campus security policies and crime statistics (covering the reporting period January 1 to December 31) and make copies of this annual report available to any prospective student or employee. Crime statistics are available for both the main campus in

Blacksburg and off-site instruction locations. This information is available both in hard copy and on the VTPD website. Crime statistics are gathered based on reports provided to campus security authorities, including VTPD, Judicial Affairs Office, Office of Residence Life, Virginia Tech Women’s Center, and the Dean of Student’s Office. Statistics are also gathered from law enforcement jurisdictions in which Virginia Tech owns, leases, or controls property or those with jurisdiction on adjacent property. The Higher Education Act of 1965 as amended: University emergency management procedures comply with the provisions of this act, including statements of campus policies for emergency response and publication of evacuation procedures; emergency communications and timely notifications in the event of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring on campus and testing of emergency evacuation procedures on an annual basis. Campus Fire Safety Right-to-Know Act (as included in The Higher Education Opportunity Act): Annual fire safety reporting to the campus community, prospective students, and the secretary of education is required. The annual fire safety report will include both data from a log of fire related events over the last two years as well as other campus fire safety information. Statistics will be collected by EHSS and reported by the Virginia Tech Police Department with the crime statistics as part of the police department’s annual report.

2.2.2 State Directives and Policies

University policies, programs, and procedures comply with Commonwealth of Virginia Executive Order 44 (2007) Establishing Preparedness Initiatives in State Government, state personnel policies including Policy 1.80 Workplace Violence, and Sections 23-9.2:3 and 23-9.2:9-11 of the Code of Virginia, as amended.

2.2.3 University Policies

The university has established policies that specifically address environmental and occupational safety, violence prevention, and employment practices. There are additional policies that cover authorized and emergency closings, safeguarding institutional assets and information, prohibited conduct regarding alcohol and drugs, anti-discrimination and harassment prevention, and student life. A comprehensive listing

of related policies is provided in Section 5.0, References. Health and Safety: Policy 1005, Health and Safety, establishes responsibilities for preventing job-related accidents, illnesses, and injuries; increasing safety awareness; meeting requirements of environmental, occupational health, and safety laws and regulations; and reducing institutional liability. It also describes the safety responsibilities for members of the university community and visitors to university-owned or occupied property. Violence prevention: In accordance with Section 23-9.2:10 of the Code of Virginia and Commonwealth of Virginia Policy 1.80 Workplace Violence, the university has established policies and procedures for the prevention of violence on campus. Policy 5616, Campus and Workplace Violence Prevention, specifically addresses the university's position on the prevention, reduction, and management of violence to provide a safe working and learning environment for our students, employees, and visitors at all university owned, controlled, or leased properties, including satellite locations. Policy 4345, Employee Assistance Program, University Policies for Student Life, and Care Team and Threat Assessment Team protocols provide policies and procedures for the assessment and intervention with individuals whose behaviors may pose a threat to themselves and/or the campus community. Faculty and staff hiring procedures: Policy 4060, Background and Driving Record Investigation, addresses the use of criminal background and driving record checks during the employment process. Applicants for faculty and staff positions are required to answer questions regarding previous convictions. Criminal background and/or driving record checks are conducted on candidates selected for certain wage and salaried positions as a condition of employment. Determination of either a job-related conviction or falsified conviction information on the application may result in denial or forfeiture of university employment. Certain positions may be designated as safety-sensitive and may be subject to additional provisions. Policy 4330, Guidelines for the Use of Volunteers, provides for conviction checks for volunteers performing security sensitive duties and defines the liability coverage for volunteers.

Student enrollment application procedures: Applicants for admission to Virginia Tech's undergraduate, graduate, and College of Veterinary Medicine programs must complete specific questions regarding prior

disciplinary actions in high school, college, or university; juvenile and adult arrests and convictions; court-ordered supervised or unsupervised probation; or under the terms of a finding under advisement.

2.2.4 Safety and Security Programs

University offices provide programs to aid departments and individuals in understanding their responsibilities to be aware of and comply with safety and security policies and procedures and with applicable law. Programs to inform students and employees about campus crime prevention, and safety and security and to encourage individuals to be responsible for their own safety and to report conditions that affect the safety and security of others are offered on a regular basis. Informational materials, adapted for student and employee audiences, are provided in presentations and print and electronic formats.

2.2.5 Facilities Design Standards and Building Access Control

Security and access control design standards have been developed for new and renovated buildings owned by the university. Designs are reviewed by the VTPD for compliance with security requirements. The VTPD will evaluate the Offices of Housing & Dining Services and Residence Life security measures to ensure residence hall security. Entrances to residence floors shall be locked at all times. Exterior doors in all residence hall buildings shall remain locked except in those buildings that house university offices. In addition, exterior entrances are allowed to be unlocked during official move-in hours each fall. Residents of the building and their escorted guests, as well as authorized persons, access the building by utilizing the card access system. Resident advisors (RAs) and Campus Watch Security make rounds during evening hours to verify that exterior entrances are locked and secured. Academic and administrative buildings are open to the public during operating hours and are generally secured after operating hours and during extended breaks. Policy 5620, Access Control/Key Control, defines how keys to university buildings will be issued, monitored, and maintained. The Key Control Office in Facilities Services and the VTPD implement and oversee access and key control procedures.

2.3 Use of University Facilities

Virginia Tech sponsors or hosts numerous programs, events, and

activities or allows its facilities to be used for programs, events, and activities. The event planner is responsible for coordinating with the appropriate university offices (e.g., Virginia Tech Police Department, Office of Emergency Management, Risk Management, and University Unions and Student Activities Event Planning Office) to ensure that appropriate arrangements are made for event security, emergency planning, and liability. Departments are responsible for notifying the VTPD of events occurring in their facility/space. The VTPD is responsible for determining the appropriate security for events. The Office of Insurance and Risk Management provides guidance on the planning, documentation, and training activities that demonstrate duty of care, as well as assistance with certificates of insurance for events. Other university policies that provide guidance for events or programs include but are not limited to

- » Policy 5000, University Facilities Usage and Event Approval – provides guidelines for the use of university facilities for activities sponsored by registered student organizations, university departments, university-associated organizations and non-university groups or organizations.
- » Policy 5010, Summer Conferences – provides guidelines for summer programs held on the Virginia Tech campus in residence and dining halls.
- » Policy 8215, Major Entertainment Sponsorship – the Department of Student Activities determines the conditions and criteria, including safety and security, under which major entertainment events may be sponsored at Virginia Tech.
- » Policy 8220, Security Requirements for Events Sponsored by Student Organizations – requires advanced planning to ensure adequate security to protect students and guests during events sponsored by student organizations.

2.4 Emergency Preparedness and Response

Virginia Tech's emergency management plans and programs address mitigation and prevention, preparedness, response, and recovery. The plans describe management structures, emphasize preparedness, and

identify interdependencies of functional areas and external partners. In compliance with the Higher Education Act of 1965 as amended, Virginia Tech's emergency preparedness and response procedures established by the Office of Emergency Management and outlined in the Emergency Response Plan provide for

- » Immediate notification of the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring on the campus, unless issuing a notification will compromise efforts to contain the emergency;
- » Annually publicizing emergency response and evacuation procedures using methods appropriate to reach students and employees; and
- » Annually testing emergency response and evacuation procedures.

2.4.1 Emergency Management Plans

In accordance with Executive Order 44(2007) Establishing Preparedness Initiatives in State Government and Section 23-9.2:9 of the Code of Virginia, the university shall develop, adopt, and keep current a written crisis and emergency management plan; every four years the university shall conduct a comprehensive review and revision of its plan, which shall be adopted formally by the Virginia Tech Board of Visitors. It is the responsibility of the Office of Emergency Management to oversee the review and update of these plans. Procedures to guide departments in developing emergency preparedness and continuity of operations plans are established by the university's Office of Emergency Management to be consistent with federal and state requirements. Departments are responsible for maintaining these plans in accordance with university guidelines and timelines.

Hazard Mitigation Plan: The university's Hazard Mitigation Plan was approved by the Federal Emergency Management Agency (FEMA) in October 2006. The plan includes an analysis of natural and man-made hazards and the development of policies, programs, and practices to assess and mitigate these risks.

Continuity of Operations Plan: The university's Continuity of Operations Plan (COOP) establishes operational and restoration procedures for essential functions. The university plan focuses on basic COOP elements: management framework, essential functions, critical systems, alternate facilities, orders of succession, delegations of authority, and vital records. The university's COOP must be updated annually.

Emergency Response Plan: The Emergency Response Plan (ERP) establishes a management framework and outlines procedures for managing major emergencies that may threaten the health and safety of the campus community or disrupt business operations on the Blacksburg campus. The university's ERP must be updated annually. Every four years, the university must conduct a comprehensive review and revision of its emergency management plan, and the revised plan must be adopted formally by the board of visitors and certified in writing to the Virginia Department of Emergency Management in accordance with Section 23-9.2.9 of the Code of Virginia.

2.4.2 Emergency Communications

In accordance with the Higher Education Act of 1965 as amended and Section 23-9.2:11 of the Code of Virginia, the university has implemented a comprehensive communications system to provide prompt warning notifications and alerts of emergencies or threats to the campus community using a variety of methods, including but not limited to e-mail notices; phone, cellular phone, and text messages; alert lines; classroom electronic message signs; posters; university website notices; and other methods. Depending on the particular circumstances, especially in all situations that could pose an immediate threat to the community and individuals, University Relations may utilize the "VT Alerts" automated notification system. The Office of University Relations and/or VTPD will notify the campus community of emergencies or crimes that have occurred and necessitate caution, evacuation, or other action on the part of students, employees, and campus visitors. Annually, the Offices of University Relations and Human Resources provide communications to the university community regarding university procedures for authorized closings and receiving emergency alerts.

3. Procedures

Individual employees and students have an obligation to accurately and promptly report crimes, emergencies, potential threats, or risks to the appropriate university office(s). Detailed procedures are included in the policies referenced in the body of this policy, the additional related policies included in section 5.0 References, and on the websites of the university offices engaged in supporting campus safety and security.

CRIMES: Virginia Tech encourages the community to report all crimes to the Virginia Tech Police Department at 911 for emergencies and 231-6411 for non-emergencies. Certain crimes may be reported online at www.police.vt.edu. Voluntary confidential and/or anonymous reporting is available at stopabuse.vt.edu or by using the TIPS crime-line at 232-TIPS.

DISTRESSED EMPLOYEES: Concerns about the behavior of or statements made by Virginia Tech employees including teaching and research faculty employees, administrative or professional employees, classified and university employees, and wage employees may be reported to Human Resources at 540/231-9331. Matters needing immediate attention should be directed to the Virginia Tech Police Department at 540/231-6411.

DISTRESSED STUDENTS: The Dean of Students Office takes reports of students who may be in distress. The dean of students reporting system allows faculty members and critical staff members identified by department heads to submit information about a student whose exhibited behaviors or statements may be of concern (in or outside the classroom). Contact may be made by phone (540/231-3787) or the reporting system available within the Hokie SPA/Faculty Access menu. Matters needing immediate attention should be directed to the Virginia Tech Police Department at 540/231-6411.

EMERGENCIES OR PERSONS OF CONCERN: Students, faculty, staff, and visitors may report emergencies, criminal actions, and suspicious behavior to the Virginia Tech Police Department by dialing 911 from any campus phone or by activating the blue emergency phones located on campus. It should be noted that if 911 is dialed from a cellular phone

or pay phone, the call will be routed to an off-campus police department or dispatch center. If this should occur, the caller should describe the nature of the emergency to the dispatcher and ask to have the call transferred to the Virginia Tech Police Department. In order to avoid this type of delay, campus patrons may consider programming cellular phones to the Virginia Tech Police Department at 540/231-6411. All non-emergency calls to the Virginia Tech police should also be directed to 540/231-6411. Virginia Tech personnel who work at off-campus sites should inquire with local officials about the proper procedures for requesting emergency assistance, including the use of cellular phones. Most Virginia locations use 911 for emergency calls. However, use of cellular phones at off-campus sites to request emergency assistance may involve delays similar to those described above, depending on how the call is routed.

INCIDENTS INVOLVING PROPERTY, AUTOMOBILES, OR POTENTIAL PUBLIC LIABILITY: All incidents involving university property, automobiles, or potential public liability should be reported to Risk Management as outlined on the Risk Management website. (www.controller.vt.edu/Risk)

WORKPLACE ACCIDENTS, INJURIES, OR ILLNESSES: An injured employee is required to immediately report an accident or illness to the direct supervisor. Upon the employee's notification of the injury to the departmental supervisor, the department is required to offer the employee a Workers Compensation Panel of Physicians. Those employees needing immediate medical treatment for serious injuries may visit the emergency room and will need to report the injury as Workers' Compensation at the time treatment is received. Once an employee reports a job-related injury, the supervisor must immediately file the Employer's Accident Report, Form VWC No. 3 with Human Resources within 24 hours of the date/time of the injury (see www.hr.vt.edu/benefits/workerscomp/index.html for procedures and contact information).

OTHER RESOURCES FOR REPORTING:

SafeWatch: Online means for identifying and anonymously reporting violations of university policies and community expectations related

to harassment, discrimination, or similar behaviors. (www.safewatch.vt.edu/form.html)

Stop Abuse: Individuals may contact Stop Abuse at the Virginia Tech's Women's Center (540/231-7806) regarding concerns about sexual assault, relationship violence, stalking, cyberstalking/online harassment, and sexual harassment. If help or support is needed after 5 p.m. during the week or on the weekend, the Women's Resource Center of the New River Valley's 24-hour hotline at 540/639-1123 should be used.

4. Definitions

Physical Campus: All buildings and grounds owned, leased, and/or operated by Virginia Tech. **Risk Assessment:** The process of identifying types of risks or hazards that could affect the institution, including (1) Hazard Identification, the determination of potential risks, hazard events, or liabilities; (2) Hazard Characterization, the evaluation of which personnel, property, income, or assets are most vulnerable to injury or damage from these hazards by severity and frequency; (3) Exposure Assessment, estimation of potential losses; and (4) Risk Characterization, the prioritization of various risk exposures.

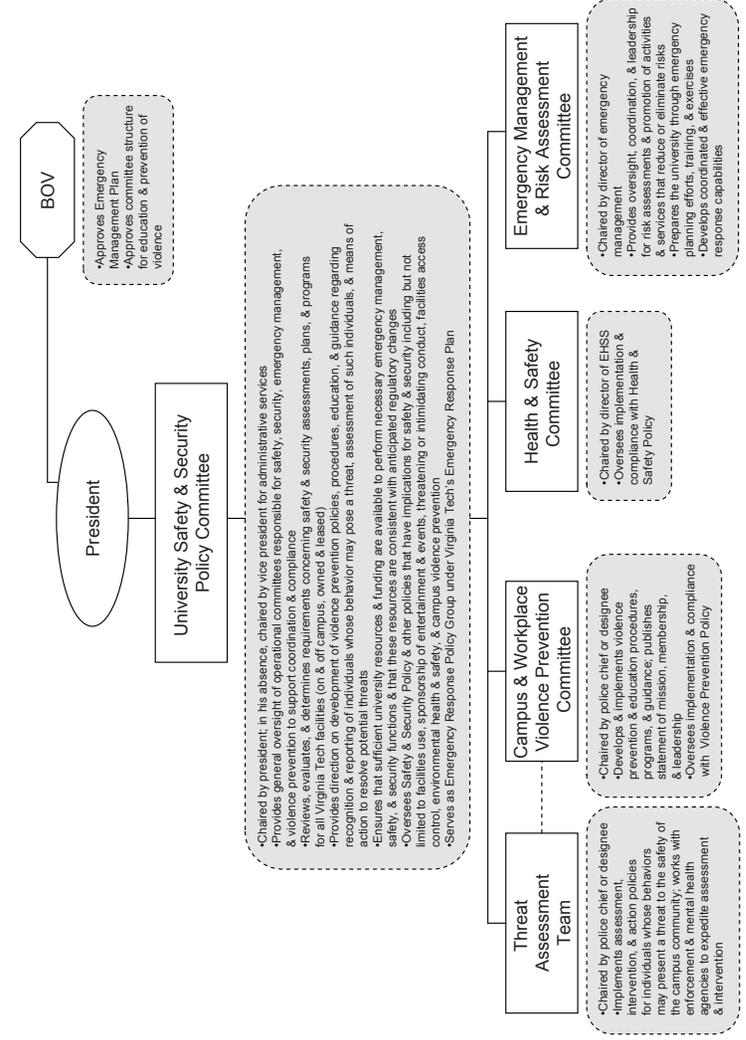
Risk Management: The policies, procedures, and practices associated with the identification, analysis, and assessment of risk exposures and appropriate strategies to eliminate, control, minimize, or avoid unacceptable risks. Control strategies may include risk assumption, risk avoidance, risk retention, risk transfer, or any other strategy or combination of strategies to manage future events. **Threat Assessment:** A fact-based investigative, analytical approach that evaluates whether an individual's behavior poses a risk to his or her safety or the safety of others. The appraisal of risk in a given situation should focus on an individual's actions, communications, and specific circumstances that might suggest that an individual intends to commit a violent act and/or is engaged in planning or preparing for that event.

5. References

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act Commonwealth of Virginia's Policy 1.80 Workplace Violence Commonwealth of Virginia Policy 2.30 Workplace Harassment. Drug-Free Workplace Act of 1988 Code of Virginia, Sections 23-9.2:3

and 23-9.2:9-11 Governor’s Executive Order 44 (2007) Higher Education Act of 1965 as amended University Policies: Health, Safety, Violence Prevention Policies 1005 Health and Safety Policy 5616 Campus and Workplace Violence Prevention Policy Presidential Policy Memorandum 251: Appointment of University Threat Assessment Team Individual Conduct (or Prohibited Conduct) 1015 Alcohol Policy 1020 Policy on a Drug-Free University 1025 Anti-Discrimination and Harassment Prevention Policy 1035 Student-Athlete Conduct 1036 Student-Athlete Substance Abuse Policy 8300 University Policies for Student Life Classified and University Staff Policies and Handbook Faculty Handbook and Special Research Faculty Handbook Reporting and Investigation 4060 Background and Driving Record Investigation 4061 Drug and Alcohol Guidelines for Commercial Drivers’ License Holders 4330 Guidelines for the Use of Volunteers 5600 Response to Bomb Threats 7035 Privacy Policy for Employees’ Electronic Communications Security Arrangements 5000 University Facilities Usage and Event Approval 5010 Summer Conferences 5403 Policy on Employee Housing 5500 State Vehicle Management 5605 Residence Hall Fire and Fire Alarm Procedures 5620 Access Control: Key Control Policy 5610 Policy on Animal Escape Notification 8215 Major Entertainment Sponsorship 8220 Security Requirements for Events Sponsored by Student Organizations

Virginia Tech Safety & Security Committee Structure



APPENDIX C

List of Interviewees

Appendix C: List of Interviewees

Interviews with University Leaders and Threat Assessment Team Members for Demonstration Project Book:

- » Brown, James Tomas: Dean of Students
- » Burton, Patricia: Employee Relations Manager
- » Ferraro, Richard: Assistant Vice President for Student Affairs
- » Flinchum, Wendell: Chief of Police
- » Flynn, Chris: Director, Cook Counseling Center
- » Heidbreder, Kay: University Legal Counsel
- » Hincker, Larry: Associate Vice President, University Relations
- » Hyer, Patricia: Associate Provost for Academic Administration
- » Keene, Frances: Director, Office of Student Conduct
- » McNamee, Mark: Senior Vice President & Provost
- » Modzeleski, William: Associate Assistant Deputy Secretary of the U.S. Department of Education's Office of Safe and Drug Free Schools
- » O'Rourke, Kim: Chief of Staff, Office of the President
- » Plummer, Ellen: Assistant Provost
- » Reineke, Emily: Threat Assessment Team & Victim Services Special Projects Coordinator
- » Spencer, Edward: Vice President for Student Affairs
- » Steger, Charles: President
- » Woodard, Linda: Assistant Vice President for Administrative Services & Chief of Staff

Supplemental Interviews:

- » Davis, Sharrika: Associate Dean of Students
- » Dean, Wanda: University Registrar
- » Wubah, Daniel: Vice President & Dean for Undergraduate Education

APPENDIX D

Additional Resources

Appendix D: Additional Resources

References and Suggested Readings:¹

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APPENDIX E

Threat Assessment Materials

Appendix E: Threat Assessment Materials

General Awareness Message to the Virginia Tech Campus

(retrieved from www.vtnews.vt.edu/campus_notices/campusnotice.php?item=2588). The format below appears in the online Virginia Tech News, “Campus Notice” section:

Threat Assessment Team:

Committed to the safety and well-being of the campus community

Early intervention is essential

Preventing violence and supporting the safety and well-being of the campus community are responsibilities of all members of the Virginia Tech community. Campus safety is enhanced through community members identifying behaviors of concern and reporting the concerns in a caring and timely manner. Early identification of such concerns allows Virginia Tech to intervene more effectively to address behaviors that are threatening or significantly disruptive to the learning, living, and working environment of Virginia Tech.

The Threat Assessment Team

Virginia law and Virginia Tech policy both require the institution to have a threat assessment team to identify, assess, and intervene with individuals whose behavior poses a threat to the safety of the campus community.

The Virginia Tech Threat Assessment Team is staffed by representatives from several university departments, with leadership from the Virginia Tech Police Department. The mission of the multidisciplinary Threat Assessment Team is to determine if an individual poses a threat to self, others, or the Virginia Tech community and to intervene to avert the threat and maintain the safety of the situation. The team responds to behaviors exhibited by students, employees, visitors, and non-affiliated persons in an attempt to prevent violence so that the Virginia Tech campus remains a safe and secure working and learning environment.

Identifying concerning behavior

There are many behaviors that may cause concern for the safety and well-being of an individual or the campus as a whole. The following is not an exhaustive list but provides examples of concerning behaviors or situations:

- » Unusual or abrupt changes in behaviors or patterns;
- » Extreme reaction to a loss or traumatic event;
- » Preoccupation with weapons, violent events, or persons who have engaged in violent acts;
- » Uncharacteristically poor performance;
- » References to harming others or planning a violent or destructive event;
- » Evidence of depression, hopelessness, or suicidal thoughts/plans;
- » Inappropriate responses such as prolonged irritability, angry outbursts, or intense reactions;
- » Strained interpersonal relations, isolating behaviors, or low self-esteem;
- » Significant change in life circumstances such as loss of job or relationship.

Again, these are just examples of behaviors that may cause concern. If you observe or become aware of situations that cause concern for safety, consult with colleagues, supervisors, or university officials and report your concerns.

Reporting concerns: “It may be nothing, but...”

If you have concerns about a person or situation, even if you think it may be nothing, you are encouraged to share the information. The information you provide, no matter how trivial it may seem by itself, may be critical to understanding a broader range of problematic or threatening behavior.

How to share your concern

If you are aware of an emergency or immediate safety concerns, call 911 and report the danger to law enforcement.

If you are concerned about threatening behavior or a disturbing situation that is NOT an emergency event, contact the Virginia Tech Police Department at 540/231-6411. Virginia Tech police are committed to preventing violence and other crimes when possible.

What you need to share

When providing information, please include the name of the person you are concerned about, the behaviors you observed, and your name. While the Threat Assessment Team does accept anonymous reports, if you don't identify yourself, the team has fewer options for addressing the situation you are concerned about.

What will happen to the information you share

Your identity and the information you share will be treated privately with your safety in mind. The information will be used to address the situation in a respectful and helpful manner. The university's Threat Assessment Team will gather more information about the situation and implement a plan to enhance the safety of the campus community.

On-campus resources for violence prevention:

- » Police Department: www.police.vt.edu, 540/231-6411
- » Cook Counseling Center: www.ucc.vt.edu, 540/231-6557
- » Dean of Students Office: www.dos.vt.edu, 540/231-3787
- » Human Resources: www.hr.vt.edu, 540/231-9331
- » Women's Center: www.womenscenter.vt.edu, 540/231-7806
- » Residence Life: www.studentprograms.vt.edu/housing, 540/231-6205

Referrals for Students Resource Card/Sticker

Resources for Student Referrals

In case of an immediate emergency, call Virginia Tech Police Department: 231-6411

For consultations or to report a distressed student, follow your college or departmental protocol and/or call

Your department head/chair _____

Your college dean _____

Dean of Students Office (for all student concerns).....231-3787

Cook Counseling Center (for psychological concerns).....231-6557

Services for Students with Disabilities (for academic accommodations).....231-3788

Campus Alcohol Abuse Prevention Center (for substance abuse issues).....231-2233

Judicial Affairs (for violations of Student Code of Conduct).....231-3790

Virginia Tech Women’s Center (for cases of sexual assault or gender issues).....231-7806

Residence Life (for concerns about the health and well-being of on-campus students)*.....231-6205

*For concerns about the health and well-being of students living off campus, the Dean of Students Office can arrange for the Blacksburg Police Department to check on off-campus students if deemed appropriate.

Please tell students about these offices, or call the office while the student is with you to make sure he or she gets an appointment. For questions or to request more stickers/cards please contact the Dean of Students Office at 231-3787.

 **VirginiaTech**
Invent the Future™

APPENDIX F

Position Descriptions

Appendix F: Position Descriptions

Staff Job Position

Position Title: Case Manager
Status: Faculty, Full-time
Department: Cook Counseling Center
Division: Student Affairs
 Revised: October 2008

I. Summary of Position

Work with multiple Virginia Tech departments and multidisciplinary community agencies to provide coordination of services to high-risk students.

II. Organizational Relationships

Responsible to: Assistant director of psychiatry

Assignments received from: Assistant director of psychiatry and director of center

Interacts with: Multidisciplinary staff of psychologists, counselors, psychiatrists, nurse practitioners, office personnel, community providers, and hospital staff.

Nature of supervision: Weekly supervision with assistant director of psychiatry and director of center

III. Duties and Responsibilities

A. Essential Functions:

- » Assist in coordination of services for high-risk students.
- » Facilitate referrals for continuity of care for students recently hospitalized.
- » Follow up and track referrals for students with identified high-risk needs.
- » Maintain full and accurate case notes for clients.
- » Attend court hearings for involuntarily hospitalized students.
- » Coordinate services with the Dean of Students Office, Resi-

dence Life, Cranwell International Center, Women’s Center, Schiffert Health Center, Disability Services, and Judicial Affairs for students with high-risk needs.

- » Conduct mandatory assessments for identified students referred to Cook Counseling Center by Dean of Students Office, Judicial Affairs, members of the Threat Assessment Team, and Virginia Tech Police Department.
- » Serve as a liaison between community mental health providers and Cook Counseling Center.

B. Essential Functions – Administrative

- » Provide outreach/educational seminars as needed.
- » Attend all counseling center staff meetings, retreats as scheduled.
- » Serve on divisional/university committee(s).
- » Attend continuing educational and professional development opportunities.
- » Perform other duties as assigned by counseling center director.

IV. Qualifications

A. Required Education, Experience, Skills, and Abilities

- » Ph.D. in counseling or clinical psychology, marriage and family therapy, counselor education; master’s degree in social work, counseling; or clinical nurse specialist with experience in case management; licensed or license-eligible in the Commonwealth of Virginia
- » Interest in and experience with the mental health needs of traditional aged college students preferred
- » Ability to work collaboratively with other mental health professionals and community resources

V. Physical Requirements

Physical ability to do essential functions with or without accommodations

Office of the Dean of Students

Case Manager

Reports to Associate Dean of Students

Student Advocacy

- » Serve as primary resource for managing student issues related to crisis intervention and coordination with other university departments.
- » Respond to walk-in and phone calls for student advocacy.
- » Serve as a member of Care Team.
- » Obtain and review updates on distressed students from members of the Division of Student Affairs Care Team.
- » Participate in Dean of Students Office on-call rotation.

University and Community Collaboration

- » Manage referrals of distressed students from administration, faculty, staff, and other members of the university community and provide feedback to referral agents.
- » Facilitate information flow between Care Team and academic departments.
- » Coordinate with Cook Counseling Center case manager as well as representatives from various other departments, including Judicial Affairs, Residence Life, Schiffert Health Center, Women’s Center, Virginia Tech Police Department, and appropriate academic administrators from colleges and departments.
- » Coordinate with external community agencies and law enforcement as appropriate.

Administrative

- » Implement interventions and coordinate services to students as needed.
- » Maintain comprehensive overview of students in distress.
- » Coordinate follow-up and tracking of students in distress.
- » Oversee record-keeping process for students in distress.

Job Title: Human Resources Case Manager**Nature of Responsibilities:**

Address the needs of staff members who have problems in areas such as performance, workplace conflict, and psychosocial issues through a variety of interventions, referrals, and follow up services. Responsibilities will include needs assessment, case management, and collaboration and consultation with Human Resources services, other university entities, the EAP program, and community providers.

Specific Duties:

1. Collecting, evaluating, and recording all facts pertaining to employee situations. Maintaining factual case records and preparing necessary statistical reports
2. Formulating intervention plans in order to minimize and/or resolve problems
3. Contacting and collaborating with other university departments to expedite resolution of problems. Maintaining a directory of community resources available to employees
4. Providing referrals to support services within the university as well as community agencies
5. Following up prior cases to monitor progress/resolution
6. Facilitating communication between employees, supervisors, and managers and across departments to address/resolve employee issues
7. Interpreting university policy regarding employees and making recommendations when policy changes are needed
8. Preparing an annual report of services provided
9. Facilitating RTW for employees, subsequent to a leave of absence due to psychological or medically related matters
10. Providing information about medical or mental health resources for employees with financial, language, and/or transportation barriers
11. Providing support and guidance to university troubleshooters in matters pertaining to case management maintenance and access to records, when appropriate.
12. Following legal, clinical, and ethical guidelines

General Qualifications:

Master's degree in education, counseling, social work, public health, or related field

Preferred:

Licensure (LCSW, LPC, PhD)

Experience:

Three to five years experience as an EAP provider or in counseling or a closely related field with a demonstrated knowledge of systems; experience managing response to crisis situations and/or trauma recovery; experience working as part of a case management support team.

Specific Skills and Competencies:

Ability to work within and assist others in navigating through complex systems; understanding of treatment programs, mental health terminology, including diagnostic categories; general knowledge of medical privacy guidelines and ability to communicate difficult/sensitive information.

Job Title: Threat Assessment Specialist

The threat assessment specialist is affiliated with the Virginia Tech Police Department; the position provides professional expertise and leadership to the university Threat Assessment Team and assists in operational assessment and intervention with individuals whose behavior poses a threat to the safety of the campus community; provides consultation in cases of potential threats of violence involving university employees, students, visitors, and others who might be referred to the team; develops workshops and provides consultation for administrators, faculty, staff, students, and community organizations regarding identification and referral of at-risk or distressed individuals and de-escalation of volatile situations; provides crisis intervention to crime victims and witnesses; and oversees the management of sensitive information for the university's Threat Assessment Team. In coordination with appropriate university units, position is responsible for developing a plan for communications, outreach, and education to foster the university's efforts in violence prevention. The threat assess-

ment specialist will be available to respond to emergencies after-hours and on week-ends. The threat assessment specialist may also serve as a collaborator with faculty in related research, outreach, and academic endeavors.

Responsibilities

Threat Assessment/Management Services:

- » In consultation with the chief of police, convenes and serves on the university's Threat Assessment Team; serves as TAT chair in absence of chief; and provides leadership and support to Campus and Workplace Violence Committee.
- » Provides threat assessment and management of potential violent situations; assesses likelihood of subject's danger to self or others; and coordinates with appropriate university departments (e.g., Human Resources, Cook Counseling Center, Dean of Students Office, Judicial Affairs, police, Office of Senior Vice President and Provost, and others as appropriate), CARE team, local, federal and state law enforcement agencies, and mental health agencies to initiate voluntary or involuntary hospitalization.
- » Coordinates, reviews, and evaluates clinical and external forensic assessments, makes recommendations for interventions, and monitors compliance with recommended treatment.
- » Responds to, assesses, and triages information from members of the university community concerned about actual or potential incidents of violence.
- » Provides information and referrals to appropriate law enforcement agencies, Student Affairs, Human Resources, student health, counseling center, student judicial affairs, and other university offices as needed; may also assist with and serve as a resource to support employee relations functions.
- » Coordinates the development of threat assessment and violence prevention procedures, protocols, and resources for the assessment of potentially violent individuals and appropriate interventions or actions to resolve the potential threat.
- » Serves as a resource to Threat Assessment Team, CARE Team, and faculty/staff assistance team.
- » Provides victim/witness assistance services to increase the comfort and cooperation level.

- » Oversees the design and development and assessment of 24-hour threat response system.
- » Serves on university committees, task forces, and other bodies as appropriate.

Outreach and Consultation:

- » In coordination with appropriate university and off-campus units, develops a plan for communications, outreach, and education for the prevention of violence on campus.
- » Trains and consults with Human Resources, law enforcement, Student Affairs, and other professionals on issues related to threat assessment and management, de-escalation of volatile situations, managing mental health issues in the learning or working environment, and similar topics.
- » Develops and conducts educational programs for the university community on topics related to threat assessment and management, crisis intervention, and de-escalation of volatile situations. Provides information and training to faculty, staff, and students about when, how, and to whom troubled individuals should be reported.
- » Consults with legal counsel, administrators, and University Relations staff on the release of information that may be sensitive.
- » Works with academic faculty engaged in related academic, research, or outreach endeavors related to threat management.

Administration:

- » Conducts programmatic evaluation and recommends policy and practice changes.
- » Provides guidance on the development of an information management process that gathers, analyzes, documents, and disseminates sensitive information; manages this process for the Threat Assessment Team.
- » Maintains records, produces reports, and organizes and disseminates TAT case management information.
- » Supervises the VTPD/Victim's Services project coordinator.

Qualifications*Required:*

- » Master's required (doctorate preferred) in clinical, social, or counseling psychology; counselor education; clinical social work; or closely related discipline from an accredited program
- » Working knowledge of threat assessment and threat management theory and practice and experience in assessment and management of cases involving potential violence
- » Demonstrated abilities to review and interpret clinical assessments and formulate interventions to minimize risk of violence and to provide crisis intervention and response, case management counseling in field/crisis settings, and information and referral
- » Demonstrated ability to develop comprehensive and multi-faceted communications, awareness, and education programs around topics of violence prevention for varied audiences
- » Demonstrated ability to interact effectively with diverse individuals and groups to reach acceptable solutions to problems
- » Demonstrated ability to think strategically and respond operationally to issues or situations posing a threat to the safety of the campus community

Preferred:

- » Experience within a higher education setting working with multi-unit, multi-disciplinary teams
- » Demonstrated ability to develop and manage projects that will involve complex and sensitive issues, knowledge of relevant laws and regulations, and coordination with multiple departments
- » Ability to receive Virginia licensure as required by profession within 18 months of employment

VTPD/Victims Services Special Projects Coordinator**Position details:**

Full time, calendar year, restricted professional faculty position

The VTPD/Victims Services Special Projects Coordinator reports to the chief of police. The primary purpose of the position is administration and management of matters pertaining to the university Threat

Assessment Team (TAT) and the Campus and Workplace Violence Prevention Committee (CWVP). In addition, this position will serve as the police department's coordinator of matters pertaining to the completion of activities as outlined in Virginia Tech's Demonstration Project grant with the U.S. Department of Education, Office of Safe and Drug Free Schools, and support for victims services projects supported by the Department of Justice grant. Duties include data management; management of meetings; organizing and implementing team trainings; coordination of administrative activities with on- and off-campus partners, including federal granting agencies and supporting team members, as needed (investigator, chief, or others).

The coordinator serves as liaison from the VTPD to partners implementing victims services, recovery, and resiliency efforts including the provost's office, Human Resources, Student Affairs, and academic and administrative offices as well as possible local, state, and federal off-campus partners such as the Virginia Department of Criminal Justice Services and other state and federal agencies. Grant-supported efforts with the U.S. Department of Education and U.S. Department of Justice might include the organization of statewide meetings, conferences, and publications to meet grant goals.

Responsibilities:

- » Supports information needs of VTPD, TAT, and VP Committee by managing data collection, compiling and analyzing data, writing reports, and presenting results to administrators and TAT/Violence Prevention Committee. Ensures that information management procedures comply with federal and state requirements and university policies.
- » Supports communication and awareness efforts by developing information sessions and presentations, assisting with or making presentations to students or employees, and developing communications materials in a variety of media.
- » Enhances collaboration of university offices, TAT, CWVP Committee, and other entities by developing and implementing information-sharing mechanisms, providing updates, ensuring that cross-over agenda items are shared, following up on assignments and deadlines, and identifying resources.

- » Assists with grant activities, including development of proposals, gathering information from Virginia Tech grant participants, and preparing assigned segments of reports and budgets.
- » Develops and maintains appropriate manuals, forms, procedures, and reports for the TAT.
- » Other duties might include assisting with the administration and management of VTPD agency accreditation, information requests, coordination and preparation for meetings with agency stakeholders, and other duties as assigned by the chief.

Qualifications:

- » Bachelor's degree required, with preference for master's degree or professional experience equating to a graduate degree in one of the following areas: psychology, management, human resources, student personnel, higher education administration, public administration, or related discipline
- » Knowledge of applicable laws and regulations regarding student and employee policies and records
- » General knowledge of threat assessment programs and practices
- » Experience working with sensitive and confidential information
- » Ability to manage projects, including report preparation
- » Familiarity with a variety of data analysis and reporting software
- » Strong written and oral communication skills
- » Ability to develop and make effective presentations to diverse populations
- » Evening and week-end work may be required.
- » Must have a background investigation including a criminal background check.

VIRGINIA POLYTECHNIC INSTITUTE AND STATE UNIVERSITY

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