



# {Care Team Manual}

**Community College of Denver**

Downtown Auraria Campus  
Health Sciences Center at Lowry  
Advanced Manufacturing Center



# **Care Team Manual**

Community College of Denver:  
Auraria, Lowry and the Advanced  
Manufacturing Center locations

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## **Introduction**

The Community College of Denver (CCD), and its affiliated campuses at Auraria, Lowry and the Advanced Manufacturing Center, “provides our diverse community an opportunity to gain quality higher education and achieve personal success in a supportive and inclusive environment.” To create this environment, we uphold the physical and emotional safety of each member of our community as a priority in adherence to our values of

- Involvement
- Student-Focus
- Integrity
- Lifelong Learning
- Excellence
- Healthy Work Environment

This manual is a guideline for effective internal operations and communication for the Care Team. It may be updated annually, or as needed, to allow for revisions and updates to system, state, and federal laws and policies and in alignment with best practices issued through the National Behavior Intervention Team Association (NaBITA) and for the Structured Interview Violence Risk Assessment (SIVRA-35).

## **Care Team Mission**

The Care Team provides early assessment and referral when an individual’s behavior is flagged as concerning, risky, or potentially harmful to self, others, or the community. The team makes a good faith review of the information provided and suggests a reasonable course of action to mitigate risk, considering the needs of the individual within the context of the community. An ethic of care and attention to the safety and wellbeing of individuals, the campus, and community guides all recommendations.

## **Purpose**

The CCD Care Team is formed by the Dean of Student Life and endorsed by the Vice President of Enrollment Administration & Student Success and College President to

- Respond to reports regarding individuals of concern;
- Work with, support, and connect individuals of concern to resources as necessary;
- Follow up with individuals of concern;
- Develop preventative identification, education, and response strategies.

## **Operational Guidelines**

The Care Team follows National Behavior Intervention Team Association (NaBITA) guidelines. In accordance with this, the team will maintain one member who is NaBITA trained and keep the team in accordance with NaBITA standards. Referenced practices may include items from the JED Foundation, the Association of Threat Assessment Professionals, and The Handbook for Campus Threat Assessment & Management Teams. Additional resources may be referenced from the Association of Title IX Administrators (ATIXA), Association of Student Conduct Administrators (ASCA), and the Higher Education Case Managers Association (HECMA) best practice guidelines.

The Care Team is structured in compliance with the Colorado Community College System's policy (SP 19-40c) stating, "each College shall establish a Behavioral Intervention Team (BIT) dedicated to prevention, intervention, and response to disruptive, concerning, and/or threatening behavior."

Additionally, we are tasked with six basic functions:

1. Gather information to assess reports of disruptive, concerning, and/or threatening behavior.
2. Assist faculty, students, and staff in identifying and reporting disruptive, concerning, and/or threatening behavior.
3. Connect individuals displaying disruptive and/or concerning behavior with appropriate campus and community resources
4. Recommend appropriate intervention strategies for individuals displaying disruptive, concerning, and/or threatening behavior.
5. Provide ongoing support to faculty and staff in working with individuals displaying disruptive and/or concerning behavior.
6. Monitor ongoing behavior of individuals who have displayed disruptive and/or concerning behavior.

## **Goals**

Our goals are two-fold:

- To maintain the integrity of campus and personal safety for all members of the community
- To support community members in crisis

## **Scope**

We are the sole Behavior Intervention and Threat Assessment team for the Community College of Denver. Including the Auraria and Lowry campuses, and the Advanced Manufacturing Center in Denver.

## **Historical Context**

The Community College of Denver's Care Team was established fall 2013 under the direction of the Dean of Student Life. The Care Team was initially Co-chaired by the Dean of Student Life and

Academic Dean. With the development of the Director of Student Conduct position, this Director and the Dean of Student Life became the Co-chairs of the team. In fall 2015 this shifted once more as the Care Case Manager position was created. The CCM supervises the actions of the Care team and is the primary contact for all things Care at the CCD community. The Care Case Manager serves as the Care Team Chair.

## **Team Membership**

The Community College of Denver's Care Team operates under the Division of Enrollment Administration and Student Success through the Office of Student Life. We are housed in the Office of Student Conduct and report directly to the Dean of Student Life.

Standing Members include:

- Chair: Care Case Manager
- Co-Chair: Director of Student Conduct
- Auraria Higher Education Police Department, Law Enforcement Representative (Member)
- Academic Representative (Member)
- Dean of Student Life (Member)
- Accessibility Center Representative (Member)
- Human Services Specialist (Member)
- Director of Resource Center (Member)
- Human Resources Representative (Member)
- Mental Health Agency Consultant (Vacant, Spring 2015)

Ad Hoc members and advisors may include but are not limited to:

- Legal Counsel for the Colorado Community College System
- Title IX Coordinator
- Civil Rights Investigator
- Lowry Campus representatives
- Advanced Manufacturing representatives
- The Phoenix Center of Auraria
- LGBTQ Student Services
- Off Campus Auraria Housing affiliates
- Auraria campus partners (CART team members)
- Faculty

Should a standing member be unable to attend a weekly meeting, the member will work with the Care Team chair to see whether a substitute need be sent in their stead.

## **Training**

Care Team members will be provided with initial and ongoing training to become familiar with BIT procedures and stay current on national trends and best practices. These trainings will be provided for standing and ad hoc members and may be conducted in collaboration with the

Colorado Community College System and/or Auraria campus Behavioral Intervention Teams (BIT) teams. Each member on the team should feel competent in utilizing Maxient, the management system of all Care cases. The Care Case Manager may be called upon to facilitate such trainings one on one with members or to the larger body. Care Team member should have an understanding of the Family Educational Rights Privacy Act and its application in the role of the Care team. Additionally, it is the responsibility of each members to protect the sensitive information by maintaining a level of privacy in administering care and recommendations for each case.

## **Expectations**

All Care Team members are expected to:

- Attend weekly scheduled meetings
- Review and familiarize with current cases listed on the Care agenda prior to attending
- Be prepared to report and share appropriate information for individuals listed on the Care agenda
- Utilize Maxient as a tool for documenting and supplementing Care reports, in regards to their scope of influence on a case.
- Provide additional outreach and support for individual cases as determined by the Care teams recommendations in an individual's action plan
- Maintain students privacy and follow established processes
- Communicate directly with the Care Case Manager should their standing or presence on the Care Team alter from the directives listed above (including but not limited to: reporting inability to attend meeting(s)) and any concerns or feedback for the Care Team's management.

## **Definitions**

**Criminal Threat:** One that is actionable by arrest and/or criminal conviction (Sokolow, Lewis, & Schuster, 2011).

**College or Campus Premises** - Includes all land, buildings, facilities, and other property in the possession of or owned, used, or controlled by the Auraria Higher Education Center, including the adjacent streets and sidewalks, and also includes Extended Campus locations such as AMC Campus and Lowry Campus. This can include online classes and degree programs as well in any physical or virtual setting agreed upon by CCD and its affiliates.

**Concerning Behavior:** Consists of words and/or actions which would cause a reasonable person to fear for an individual's mental and/or emotional well-being. (SP 19-40c).

**Day** - Refers to working / business day unless otherwise noted below.

**Direct Threat:** Exists where there is a high probability of substantial harm based on an individualized assessment of the most recently available medical judgment or objective knowledge, that determines the nature, duration and severity of the risk, and the probability that the potentially threatening injury will actually occur, and whether the threat can be averted



through the implementation of reasonable accommodations or modifications (Sokolow, Lewis, & Schuster, 2011).

**Disruptive Behavior:** Consists of words and/or actions which have the effect of interfering with normal College operations and/or the educational or working environment. (SP 19-40c).

**Forensic or Other Threat Assessment:** A student may be requested or required by the Care Team to complete a forensic or other threat assessment with a clinician or other practitioner, with experience and credentialing in assessing work place or other violence. This assessment may be requested or required when a direct threat has been communicated.

**Member of the College** - Includes any person who is a student, faculty member, staff, College official, or any other person employed by the College.

**Psychological or Mental Health Assessment:** At the request of the Care Team a student may be asked to complete a psychological or mental health assessment to assess their level of risk and or danger to themselves or others. This assessment is typically conducted by a mental health clinician and can be used to assess the following; danger to self or others, substance use or abuse, awkward or strange behavior, reality testing, etc. These assessments typically include recommendations from the clinician. An assessment may include, but is not limited to interviews, observations, testing and other formal or informal assessment methods (Framingham, 2014).

**Student:** All persons taking courses at or sponsored by the College(s), both full-time and part-time, pursuing both undergraduate credit and non-credit courses, and those concurrently attending secondary or post-secondary institutions and College. Persons who are not officially enrolled for a specific term, but who have a continuing relationship with the College are considered students (CCCS SP 4-30, 2015).

**Risk:** Risk is defined as any conduct or behavior that presents a clear and present danger to self, others, entity, or the campus community. **Risk Assessment:** Representatives of the Care Team assess for risk when issues of behavior and/or safety arise. Risk assessment is a tool used to assess an individual's particular physical, emotional, and psychological wellbeing and aid in determining the next, appropriate, course of action.

**Threatening Behavior:** Consists of words and/or actions which would cause a reasonable person to fear that an individual may put his/her safety at risk, or that of other members of the College community. (SP 19-40c).

**True Threat:** A threat that a reasonable person would interpret as a serious expression of intent to inflict bodily harm upon specific individuals (Sokolow, Lewis, & Schuster, 2011).

### Internal Communication

#### Phone and Email

Should an urgent student crisis or situation arise, the Care Team Chair (Care Case Manager) and Co-Chair (Director of Student Conduct) should be notified immediately at 303-352-4020. The information will then be relayed to Care Team members by the Care Case Manager. The Care Case Manager will attempt to reach Care Team members through email and their direct office phone lines to convene an ad hoc meeting. The Care Team is not a crisis intervention team and should not be contacted prior to law enforcement agencies in the event of an imminent safety concern or threat. The Care Team should receive a report submission for each situation.

### **Response and Alternative Coverage**

In the event that the Chair of the Care Team (Care Case Manager) is not present, unavailable, or unable to respond to an urgent concern, the Co-Chair (Director of Student Conduct) should be contacted. If the Office of Student Conduct is unable to respond the Dean of Student Life should then be contacted. As stated above, if an imminent safety concern or threat exists, law enforcement needs to be notified immediately.

### **Meeting Frequency**

The Community College of Denver Care Team for all CCD locations/campuses meets regularly (non-emergency) once a week for two hours (with the exception of system approved holidays). The team Chair or Co-Chair may convene an ad hoc meeting, in person or over the phone, in the event an urgent situation arises. This is determined on a case-by-case basis as needed. The time, date, and location of said meeting will be determined based on team member and facility availability. It is recommended facilities maintain an available phone line for use.

### **Data Tracking Systems**

The college uses the Student Conduct software Maxient to maintain Care Team records. Additional academic records related to the student's specific case may be accessed by the Chair through Banner notes, Stear alerts, the Rocky Mountain Crisis Partners Sharepoint reports, Campus Assessment and Response Team (CART) agendas, Auraria campus crime logs, Lowry campus security reports, Colorado state criminal history reports, and police reports.

### **Meeting Notes**

The Care Case Manager is responsible for documenting notes for each care meeting. These notes should include demographic information about individuals listed in cases, actions the Care Team has already taken, actions that will be taken, requests for what further information is needed. The Care Case Manager is responsible for transcribing these notes onto Maxient, per individual case, as well as having a copy of the agenda on the shared file network for preservation. Individual members of the Care Team may also input notes on relevant interactions and follow

up for cases directly into Maxient and advise the CCM of any updates. Individual members may retain sole possession notes they have been created for personal management of the cases. These notes should not be uploaded into Maxient, the shared network, or shared with any individuals.

### **Sole Possession Notes**

The Care Case Manager may keep personal notes on individuals through the use of a personal notebook or folder. Personal notes developed through the formal conversation and relationship the CCM has established with individuals may be considered sole possession notes. These notes shall not be created, shared, published, transcribed, or stored into any record keeping software, server, or college computer. "Sole possession notes" are FERPA exempt and not subject to subpoena or distribution under the condition they are not shared.

### **Disability and Health Records**

The ADAA privacy rule allows for Accessibility Center staff to share disability record information with the Care Team, for the purposes of reasonable accommodation of an individual with a disability. This information is FERPA protected and any releases of such information should be documented. The Care Team shall not document any disability-related or medical treatment information unless there are significant risk concerns related to this information. There should be clear notes justifying the storage of this information.

### **External Communications**

#### **Reporting to the Care Team**

When there is an urgent concern, we suggest to all reporting parties to contact the Care Case Manager in addition to a Care report for immediate follow up. Community members should contact police first if there is an imminent threat to self or safety, or an emergency situation requiring assistance. Non-emergency situations should be reported to the CCD Care Team using the active reporting portal found on the [www.ccd.edu/care](http://www.ccd.edu/care) website or by calling the Care Case Manager at 303-352-4020.

#### **Response and Follow Up**

All Care reports will be issued a receipt to the reporting party confirming review of the case. This receipt will be issued within one day of review. Cases will be processed within this same time frame.

The Care Case Manager will begin outreach within one day of receipt. Outreach is made in order to schedule the student to attend a meeting with the Care Case Manager. Meetings may be held remotely at an alternative campus location or over the phone.

Outreach to students may appear as follows:

- First Attempt- Will be through the individual's student email account (@student.cccs.edu) within the one day of the receipt and review, unless the situation is escalated and renders a direct call or on the scene response.
- Second Attempt – Should occur within 2 days of initial email and be in the form of a phone call. If the student does not have a valid phone line, this may be traded for a follow up email in its stead.
- Third Attempt – Following the initial phone call, a second call attempt will be made 5-7 days later.
- Fourth/final Attempt – A final email will be sent to the student within 3 days of the last attempt.

### **Additional Outreach Methods**

Should the attempts to outreach be unsuccessful the following may occur:

- If the case is listed to have a moderate risk or higher, the Care Case Manager may reach out to the student's instructors to organize a date/time to connect with the student in class. Instructors may also be contacted for any case to seek context on a student's participation level at the College.
- If the student is non-responsive but may be in need of campus resources or agencies, the Care Case Manager may email the student with the information and continue to close the case.
- If the student maintains a level of non-response, the Care Case Manager may reach out to the reporting party, academic advisors, and/or faculty members to gauge the individual's status on campus (participation, attendance, etc).
- If the student is non-responsive, this is their first Care report or their first Care report in a year, and there are no escalating concerns, the Care Team may decide to close the case and mark it as informational.
- In urgent or immediate situations, the Care Case Manager may attempt to pull the student out of class, request a welfare check from their local police department, or, with approval of the Dean of Student Life, contact the student's family or guardian.

### **Record Keeping**

Care records come in multiple forms: incident reports, communication, and supporting information. All these pieces of information should be submitted in a timely manner to the Maxient database system. The Care Case Manager is responsible for maintaining these records

and following up with reporters and team members if more documentation is needed. Records should be free of assumptions, personal opinions, self-diagnosis, and opinions. Records should consistently be unaltered fact. It is important to keep records free of error. All records should be electronic, any paper documents should be scanned and then disposed of properly (shredded, lockbox). Records should be maintained in full compliance with FERPA guidelines as all Care Team records are considered a part of the student's education records

**Incident reports-** Incident reports are initial reports of concern from stakeholders. These reports document the concerning behavior or issues.

**Communication-** Communication documentation typically come in forms of e-mails, notes in Maxient, follow-up communication and scanned forms such as Release of Information forms.

**Supporting Information-** Supporting information is additional evidence used when processing an incident report such as criminal history, police reports, notes from other campus offices, degree audit and more.

Care Team agendas and minutes should also be considered documentation and kept in the share drive for access by the care team.

## **Record Retention**

These Care records should be retained for 7 years within the Maxient database to sync with best practice in the field according to the National Behavioral Intervention Team Association (NABITA) and Association of Student Conduct Administrators (ASCA). At this time, there is no record request or expungement procedures. This is an area of development in conjunction with the Colorado Community College System.

## **FERPA and Record Privacy**

The student records that are maintained by the Care Team are protected under the Family Educational Rights and Privacy (FERPA) Act (20 U.S.C. § 1232g; 34 CFR Part 99). FERPA seeks to protect student educational records such as academic, disciplinary or care records. Guidelines for the record protection are outlined by the CCCS Board and System Policies 4-80. Care records are considered part of a student's educational records but are not considered disciplinary or academic in nature. They can be released upon direct and specific request and consent by the student in writing.

Additionally, FERPA does not prohibit the sharing of information or observations from community members to the Care Team about a student of concern. Community members do not need to ascertain whether there is an emergency situation of a threat to self or others, but rather to report concerning behavior.

As a member of the Auraria campus, we are members of a tri-institutional campus. Because of this, a Memorandum of Understanding (MOU) was established between the Community College of Denver (CCD), University of Colorado Denver (CU Denver), Metro State University Denver (MSU Denver), and the Auraria Police Department (APD) to share protected information regarding campus safety concerns. There has been a tendency for students of concern to transfer institutions amongst the campus, evading campus follow up and proceedings. In an effort to mitigate these safety concerns this MOU allows for the three institutions to collaborate more effectively in working with these cases. Please see Appendix F for a sample of the MOU.

### **Reporting Recommendations & Responsibilities**

Staff and faculty are responsible to report concerns about a student's safety and need to the Care Team in a timely manner. Students are also recommended to submit reports for any individuals of concern. Areas of concern recommended to be reported include, but are not limited to:

- Accidental overdose
- Alarming statements referencing bombs, firearms, ammunition (may include a significant interest in using, obtaining, or glamorizing these items)
- Bias-motivated incidents and discrimination
- Classroom disruption
- Concerns about a student's patterned truancy
- Death of a student, their relatives, guardian, and/or significant other
- Demonstrations of distress, grief, anger, or unpredictable behavior
- Disappearances, missing persons, kidnappings
- Extreme disrespect or insubordination to faculty and/or staff
- Harassment (physical, verbal, and emotional)
- Hospitalizations or significant health concerns
- Interpersonal violence (dating, domestic, and relationship violence- must be reported under CSA reporting standards and in compliance with Title IX statutes, and the Clery Act)
- Lack of basic human needs (housing, food, clothing, etc)
- Mental health support/needs
- Observed altered behavioral patterns (changes in appearance, performances, demeanor, appetite, etc)
- Paranoia
- Self-injury (may include cutting, burning, etc)
- Substance abuse
- Suicidal thoughts and ideation
- Stalking
- Threatening words or actions

## **Procedural Overview**

The Care Team provides the institution risk assessments on students of concern. This is issued when the team receives a report related to student risk. In the event a potential threat exists, the Care team will collaborate with Auraria Police Department and/or Denver Police Department to administer a threat assessment. Local law enforcement agencies will determine whether the threat is credible, if the threat is serious in nature/severity, and resources the individual making the threat has at their disposal (What is their intent/motive? Do they have the means to carry out this threat? Is there access to weapons? Etc.).

The Care Team reserves the right to bypass a formal risk assessment in the event of an immediate and/or imminent threat. This waiver would be granted through approval of the Dean of Student Life and the Vice President for Enrollment Administration and Student Success, acting in accordance with law enforcement's recommendation for emergency response. Should an individual be deemed to interfere with campus safety and be removed from campus, student will be subject to review of BP 3-10 policy through the Office of Student Conduct.

## **Amnesty Clause**

Individuals meeting with the Care Team may be granted amnesty for minor student misconduct (such as alcohol or drug violations) related to the given case. This decision would be at the discretion of the Care Case Manager. Amnesty will not negate required reporting standards for the Clery Act, Title IX statute, or Campus Security Act's Mandatory Reporting role.

## **Campus Notifications**

There are two levels of campus notifications issued by the Care Team, in collaboration with the Office of Student Conduct – a Student of Concern notification or a CCD Campus Ban. All notifications and bans will provide information on the students demographics, a picture (when available), and a point of contact for the case.

The Student of Concern notification would be issued to specific partners within the CCD community if a student is exemplifying concerning behaviors but no conduct violations have occurred. This notification would be to advise staff to document and notify the Care Team of any concerning behaviors demonstrated. Additionally, it is a reminder to community members to contact Auraria Police Department if this individual poses a threat or there is a safety concern.

The CCD Campus ban is issued by the Office of Student Conduct and is typically tied to a violation of the student code of conduct. A Campus ban has two levels, an interim or permanent. The interim ban is issued temporarily to give the individual a window of time to complete assigned

sanctions by the OSC or while a person is undergoing an investigation process and there is a need to have them temporarily removed from the institution. A permanent ban is issued when a student is suspended or expelled. This may or may not be tied to safety concerns. When a ban is placed, the Auraria Police Department is notified for enforcement. If a student is banned from Auraria by one of the other two institutions, CCD is bound by the Memorandum of Understanding (MOU) to honor the ban.

The Auraria Police department may also issue a Campus ban for Auraria in addition to, or separate from CCD's process.

### **Mandated Assessments**

The Care Team may mandate a psychological evaluation/assessment of an individual if the individual:

- Poses a true threat to the well-being and safety of the community
- The individual is exhibiting concerning, disruptive, and/or threatening behaviors negatively impacting the community.

The cost for such an assessment will be absorbed by the department of Student Life, should the individual be experiencing undue hardship and is unable to pay for the assessment. The individual will be given a limited time period to complete a psychological assessment and may be restricted from campus until said assessment is completed.

In order for this assessment to be considered for continuation or re-entry into the CCD community, the individual must complete a release of information so results may be reviewed by the Care Team. All written communication regarding the assignment and completion of a psychological assessment will be conducted formally through the individuals CCD email account.

### **Interim Suspension and/or Involuntary Withdrawal**

In extenuating situations, an individual who poses a true threat may be issued an interim suspension while a decision is made on their status and presence as a member of the CCD community. This sanction would be administered at the recommendation of the Care Team and issued through the Office of Student Conduct. This procedure is in alignment with CCCS policy BP 4-10.

In making this decision, the Care Team will consider

- Concerns and risk factors present for the student and their well-being.
- Concerns and risk factors present for the safety and well-being of other students.



- Concerns and risk factors present for the safety and well-being of the CCD community as a whole.

## **Re-Enrollment**

Individuals are permitted to return upon the end of the leave subject to the conditions or restrictions outlined and agreed upon prior to the leave. This may include an individual taking time away that will adequately address their needs and concerns that may have contributed to their leave. Additionally, individuals may be required to complete a mental health evaluation or provide documentation from a mental health care provider assuring that the student's health circumstances have been addressed and the student will be able to participate in a satisfactory manner. Requests for re-enrollment should be submitted to the Care Team for review at least 30 days following their leave but prior to the term in which they intend to return for. Students will be required to meet with a member of the Care Team to develop an action plan for re-entry and transition back into the institution. This is done in an effort to ensure the success of the student upon return.

## **Behaviors that may result from a condition of disability**

As protected by Section 504 of Rehabilitation Act of 1973 an individual with a disability may only be separated on the basis of this disability when they are not otherwise qualified to participate in the educational program of the institution. However, when the potential for harm to others is present, involuntary leave processes must consider whether the endangering behavior results from a condition of disability. When a student is a direct threat, they are not otherwise qualified under disabilities law and may be placed on leave.

## **Risk Management Process**

The Care Team, with direction from the Care Case Manager, will implement an appropriate and necessary response in working with individual students reported to the team. These actions may include: creating an action plan for continuous care, referrals to campus and community resources, scheduled follow up visits with the Care Case Manager, or referrals to the Office of Student Conduct.

Referrals may be made to campus partners such as the Office of Human Services, the Phoenix Center of Auraria; Financial Aid, the Cashiers office, the Resource Center, the Accessibility Center, and/or the Advising Center. Additionally, referrals may also be issued to community agencies like the Rocky Mountain Crisis Hotline, The Samaritan House, Denver Rescue Mission, MetroCaring, and Centennial Peaks Hospital. These resources are not a comprehensive list of organizations the Care Team may partner or refer to.

Steps conducted by the CCD Care Team in the process of assessing risk and threat are adapted from best practices and listed below (Deisinger, Randazzo, O'Neill, & Savage, 2008):

1. Identify a student who is demonstrating disturbing behavior such as threatening behaviors or other behaviors that raise serious concern about the individual's well-being, stability, or potential for violence or suicide
2. Identify if the situation is imminent or an emergency
  - a. If an emergency, take immediate action by notifying law enforcement
  - b. If non-emergency, proceed to step 3
3. Gather additional information from the following, if applicable:
  - a. Faculty
  - b. Academic Advisors
  - c. Campus Administrators & Staff
  - d. Judicial / Conduct records
  - e. Campus Police / Security / Local Law Enforcement
  - f. Student Housing
  - g. Student life / campus clubs & organizations
  - h. Mental Health / Health Care Provider
  - i. Family/ Emergency Contact
  - j. Criminal History/Background Checks
  - k. Accessibility Center
  - l. Other
4. Review information and create a comprehensive picture of the individual
5. Assess for threat: Does the person potentially pose a threat to themselves, others or both?
  - a. If so, utilize the SIVRA-35 Threat Assessment Tool (NaBITA) after notifying CCCS legal counsel and the system's Vice President of Student Affairs, and utilizing the Care Team Direct Threat Assessment Form.
    - i. Implement necessary interventions through Student Conduct, law enforcement, or other means
    - ii. If necessary, request additional information through a forensic or psychological risk assessment process
  - b. If not, does the person show a need for help or intervention, such as mental health care?
6. Develop and implement a plan to manage and/or monitor the individual and risk of threat, continually reviewing new information.
7. Report to Auraria Campus Assessment and Response Team (CART) members on status of individual and current actions taking place.
8. Monitor the plan and modify as needed
9. Refer, follow up, and close the case as appropriate

## **Community Outreach**

The Care Team provides community outreach and education to the CCD and Auraria community in hopes of cultivating a community of caring. This may be presented in a variety of way, including, but not limited to:

- Identifying students of concern
- Hosting community dialogues on current events
- Facilitating webinars on Care related topics
- Referral source for campus and community resources
- Consultations on conflict resolution
- Sponsoring “Active Shooter” trainings and trainings on violent individuals
- Presenting and hosting Suicide Prevention trainings
- Tabling to educate community members on reporting processes and Care team services

## **Community Membership**

The Care Team serves as one of three Care Teams on the Auraria campus. In order to fully assess risk to the institution, the Care Team will have representations on the Campus Assessment and Response Team (CART) monthly meetings. The Care Case Manager will attend monthly meetings with the Auraria Case Managers to discuss institutional needs and review case studies. Additionally, the Care Team will have a representative present at the Auraria Mental Health monthly meetings and the Auraria Emergency Preparedness and Response Committee (EPARC) meetings.

## **Program Assessment**

The Care team should conduct regular assessments in satisfaction and effectiveness. There should be assessments conducted on the level of care given to individuals being seen by the Care team, as well as those reporting. Additionally, there should be annual appraisals by members of the Care team in which members have an opportunity to disclose areas of improvement and strengths of the team’s current practices.

## References

Colorado Community Colleges System (2016). *System Policies*. SP 4-30, 19-40c.

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\*We would like to express our appreciation to the University of Colorado Denver and Austin Community College for sharing their CARE manuals which we utilized as a framework in establishing our own.

## Appendices

- A. GAP Analysis
- B. Sample Outreach Letter
- C. Care Team Response Flow Chart
- D. Sample Care Report
- E. NaBITA Threat Assessment Tool
- F. Memorandum of Understanding (MOU) – Auraria Campus
- G. Sample Marketing tool

## Appendix A

### *GAP Analysis*

Spring 2016

In development of this manual and the recent creation of the Care Case Manager role at the Community College of Denver, we have identified the following areas that require further development for effective management of this Care team.

- A “Duty to Report” Clause – at the current time (February 2016) the Community College of Denver, nor the Colorado Community College System, have established a campus requirement that members of the CCD community are obligated or trained to report concerning, disruptive, or threatening behaviors. It is our recommendation that the institution implement a Duty to Report clause that would require staff and faculty to report such behaviors to the Care team, to mitigate and track any patterns in behavior. This recommendation follows suit on the reflection of the Arapahoe High School Shooting report and the University of Colorado Denver’s Care team review of the James Holmes case.
- A formalized record expungement procedure – The Care team recommends CCD conduct a review of best practices for expungement of Care records that is in alignment with the Office of Student Conduct, Admissions & Enrollment, and Registrar’s protocols. We believe that there should be an established timeline for deletion of records in accordance with enrollment expectations/requirements which may influence an individual’s eligibility to return.
- Ongoing Assessment – In continuation to the existing satisfaction survey’s established, the Care team would recommend structuring and executing a long-term assessment plan which would provide research based on CCD’s Care needs and demographics. Assessment should include retention rate, demographics of populations served, evaluation of areas of improvement, a fiscal review to determine funding for psychological assessments, on going trainings, community outreach, and mental health services.
- Establishing a formal relationship with mental health care providers serving on the Care team – The systems recent requirements for the presence of a mental health care clinician on the Care team opens opportunities for development of mental health services and trainings for the CCD community. We highly suggest working with upper administrators and the system to create a strategic plan to implement preventative care measures serving students and the Care team.
- Development of a postvention plan – The Care team would encourage CCD to formalize postvention plans for various campus crises that may occur and what role the Care team

should perform in such instances. More specifically though, the Care team would like to charge the Care Case Manager with the development of a postvention plan for suicide and/or suicide attempts within the CCD community. This development should be in alignment with current practices of prevention including the ‘Working Minds – Suicide Prevention’ trainings and the Higher Education Mental Health Associations (HEMHA) best practices.

- Establishing an administrative review procedure for students of concern – A frequent message the Care team has received is that there is a lack of action or follow through when working with students of concern. Specifically, students who are failing to succeed at CCD, despite the extensive use of resources offered them. We would recommend the review of a policy which would track such behaviors and lead to an intervention method in order to preserve the relationship of the student with the institution.
- Working with Legal Counsel surrounding a procedure for record keeping in matters of litigation – In anticipation for legal requests for records that may outdate the seven year procedure for record keeping, we recommend speaking with legal counsel regarding any procedures or protocols on the system level to manage such requests in the long term.

## **Appendix B**

### ***Sample Outreach Letter***

DATE

INDIVIDUALS NAME

Sent electronically to INDIVIDUALS CCD [EMAIL@student.cccs.edu](mailto:EMAIL@student.cccs.edu)

#### **PERSONAL AND CONFIDENTIAL**

Regarding Case Number: MAXIENT CASE#

Dear INDIVIDUALS NAME,

As part of ensuring the safety, security, and support of every member of Community College of Denver (CCD) community, the Care Team receives and responds to notifications of students who may be experiencing significant life changes and/or are demonstrating concerning behaviors. The Care Team is here as a reference and support to students going through unique circumstances while in their academic pursuits.

I am reaching out to you specifically as I was made aware you might be in need of support connecting with available resources to help you SPECIFIC FOLLOW UP/SUBJECT MATTER. I would love to meet with you and hear about your experience and discuss some options in the next week.

Please contact our staff at 303-352-3205 to schedule a one hour appointment to be held in Tivoli 343. If you are unable to visit this location as you are limited to another campus or have an extenuating circumstance, we may make arrangements to meet you at a closer campus location or over the phone.

Additionally, if you are registered with CCD's Accessibility Center and will need any ADA (American Disabilities Act) accommodations for our time together please let us know as we may need a 48-hour notice to accommodate your needs. Además, tenemos la opción de llevar a cabo la reunión en español.

Please know we are committed to you and the CCD community. We want to see you be successful in all areas of your academic journey. Please contact our office at 303-352-3205 to schedule your appointment. I look forward to meeting you and hearing your story.

Sincerely,

Heilit Biehl

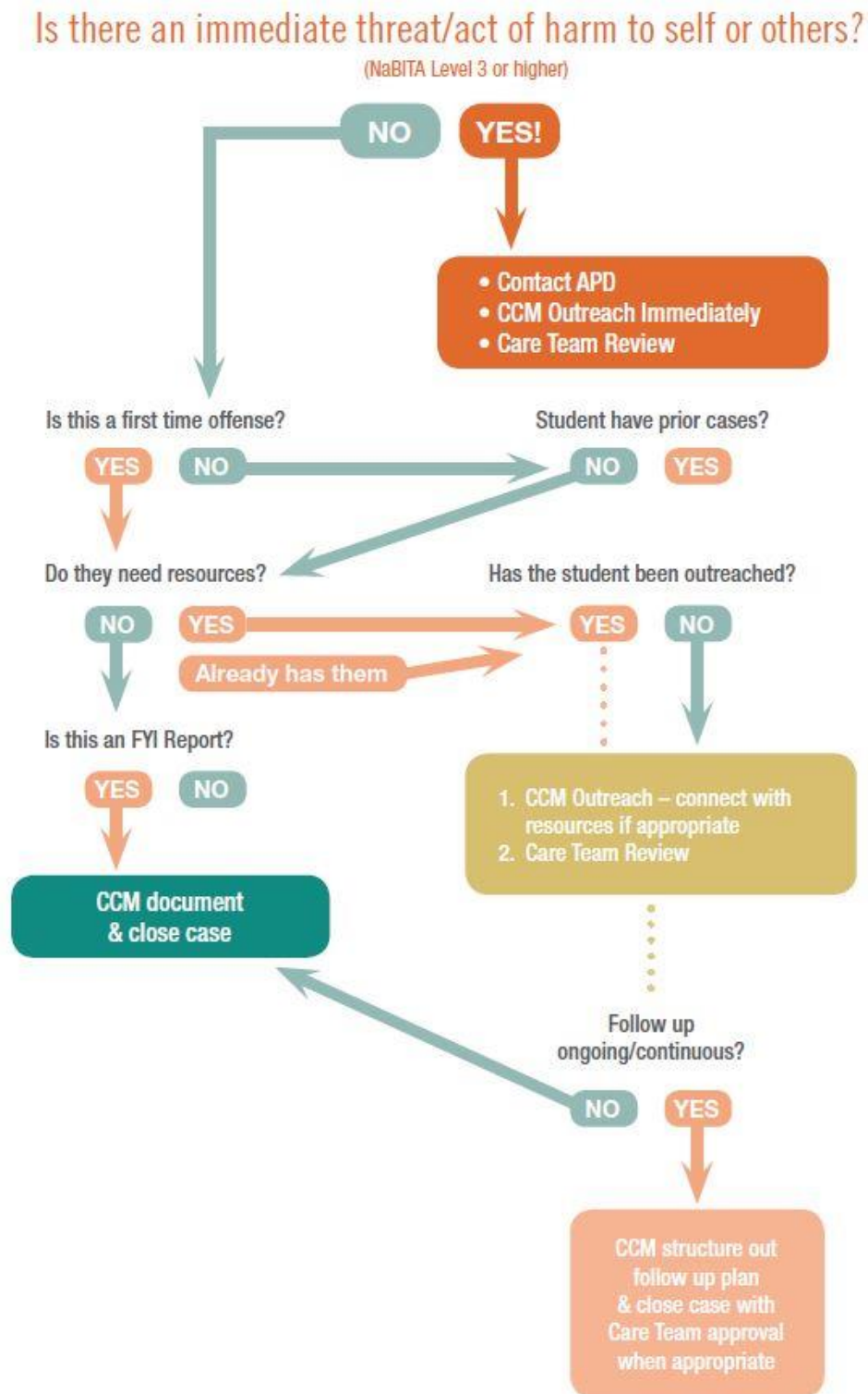
Care Case Manager

Community College of Denver




## Appendix C

### Care Team Response Flow Chart



## Appendix D

### Sample Care Report Form



## Incident Reporting Form

#### Background Information

Your full name:

Your position/title:

Your phone number:

Your email address:  ☒ Email me a copy of this report

Your physical address:

\* Nature of this report:

Urgency of this report:

\* Date of incident:  must be formatted **YYYY-MM-DD**

Time of incident:  :  :

\* Location of incident:

Specific location:

#### Involved Parties

Please list the individuals involved (excluding yourself), including as many of the listed fields as you can provide. For non-students, please list an SSN or Drivers License number in the block labeled "ID Number" if available.

<input type="text" value="Name or Organization"/>	<input type="text" value="====[Select Gender]===="/>	<input type="text" value="====[Select Role]===="/>	<input type="text" value="ID Number (Use cap)"/>
<input type="text" value="DOB (YYYY-MM-DD)"/>	<input type="text" value="Phone number"/>	<input type="text" value="Email address"/>	<input type="text" value="Hall/Address"/>

#### Description / Narrative

Please provide a detailed description of the incident/concern using **specific** concise, objective language (Who, what, where, when, why, and how).

[Check Spelling & Preview](#)

#### Additional Questions

\* Were police called and did they respond? ☐ Yes ☐ No

Please list the police report number (when applicable):

If you are a faculty member; please indicate your department chair:

If you are a faculty member; please indicate your dean:

### Supporting Documentation

Photos, video, email, and other supporting documents may be attached below. *Maximum 12 megabytes per file*  
**Attachments require time to upload, so please be patient after you click to submit this report.**

No file selected.

### One last step ...

**Help us prevent spam reports.** Prove you're a human by typing the letters and numbers as you see them in the block to the right.  
**Capitalization does not matter but cookies must be enabled** in your browser for this to work.

Type it here:

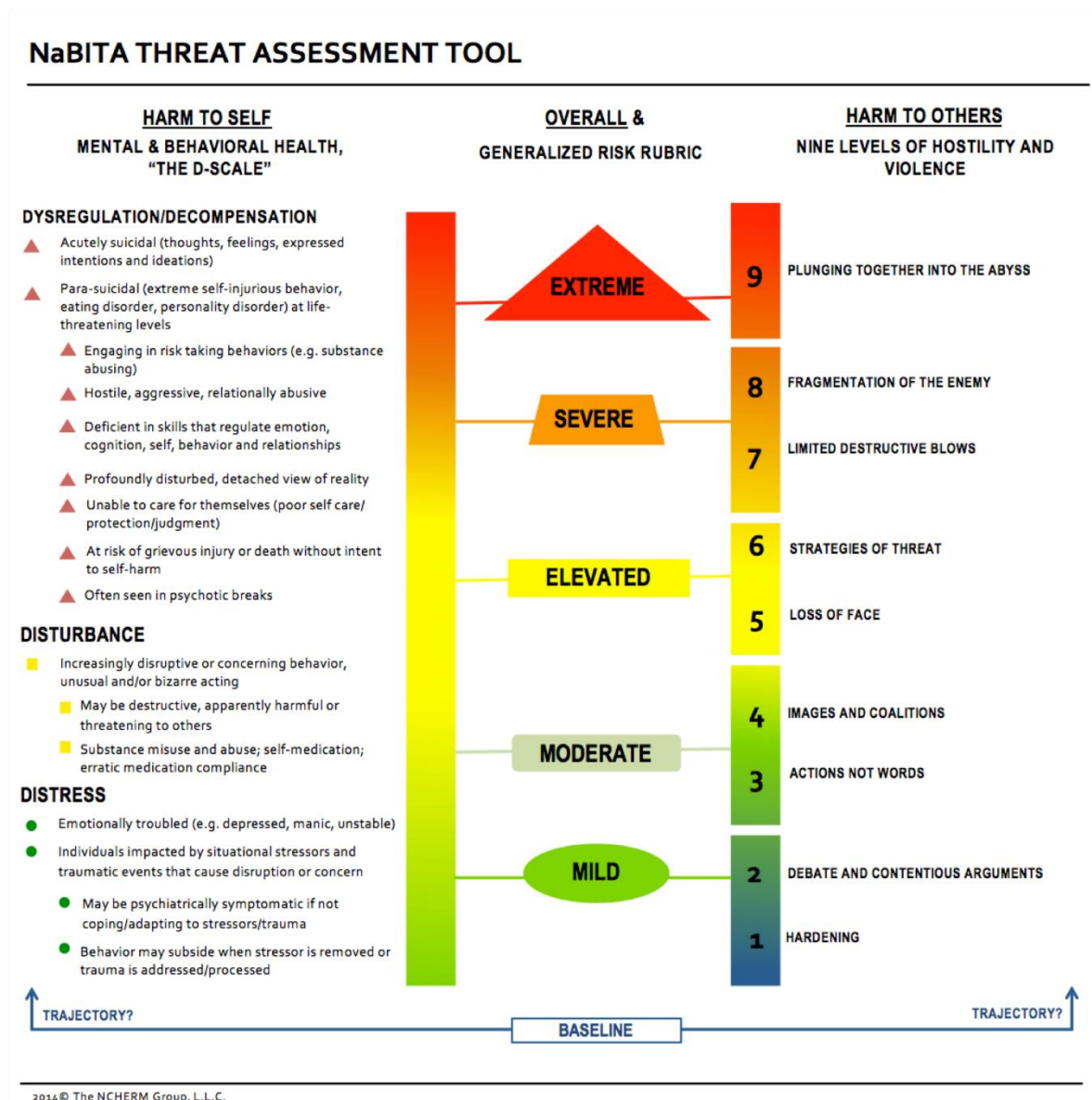
nTYKF



[I can't read it; let's try a different one.](#)

## Appendix E

### NaBITA Threat Assessment Tool



CLASSIFYING RISK	INTERVENTION TOOLS TO ADDRESS RISK AS CLASSIFIED
<b>MILD RISK</b> <ul style="list-style-type: none"> <li>Disruptive or concerning behavior</li> <li>May or may not show signs of distress</li> <li>No threat made or present</li> </ul>	<b>MILD RISK</b> <ul style="list-style-type: none"> <li>Meeting/soft referral by reporter</li> <li>Behavioral contract or treatment plan with student or employee (if at all, only for low-level concerns)</li> <li>Student conduct or HR response</li> <li>Evaluate for disability services and/or medical referral</li> <li>Conflict management, mediation, problem-solving</li> </ul>
<b>MODERATE RISK</b> <ul style="list-style-type: none"> <li>More involved or repeated disruption. Behavior more concerning. Likely distressed or low-level disturbance</li> <li>Possible threat made or perceived</li> <li>Threat is vague and indirect</li> <li>Information about threat or threat itself is inconsistent, implausible or lacks detail</li> <li>Threat lacks realism</li> <li>Content of threat suggests threatener is unlikely to carry it out</li> </ul>	<b>MODERATE RISK</b> <ul style="list-style-type: none"> <li>Meeting/soft referral by reporter</li> <li>Behavioral contract or treatment plan with student (if at all, only for low-level concerns)</li> <li>Student conduct or HR response</li> <li>Evaluate for disability services and/or medical referral</li> <li>Conflict management, mediation (not if physical/violent), problem-solving</li> </ul>
<b>ELEVATED RISK</b> <ul style="list-style-type: none"> <li>Seriously disruptive incident(s)</li> <li>Exhibiting clear distress, more likely disturbance</li> <li>Threat made or present</li> <li>Threat is vague and indirect, but may be repeated or shared with multiple reporters</li> <li>Information about threat or threat itself is inconsistent, implausible or lacks detail</li> <li>Threat lacks realism, or is repeated with variations</li> <li>Content of threat suggests threatener is unlikely to carry it out</li> </ul>	<b>ELEVATED RISK</b> <ul style="list-style-type: none"> <li>Meeting/mandated referral by reporter</li> <li>Evaluate parental/guardian notification</li> <li>Obtain and assess medical/educational and other records</li> <li>Consider interim suspension if applicable</li> <li>Evaluate for disability services and/or medical referral</li> <li>Consider referral or mandated assessment</li> <li>SIVRA-35 or other violence risk assessment</li> </ul>
<b>SEVERE RISK</b> <ul style="list-style-type: none"> <li>Disturbed or advancing to dysregulation</li> <li>Threat made or present</li> <li>Threat is vague, but direct, or specific but indirect</li> <li>Likely to be repeated or shared with multiple reporters</li> <li>Information about threat or threat itself is consistent, plausible or includes increasing detail of a plan (time, place, etc.)</li> <li>Threat likely to be repeated with consistency (may try to convince listener they are serious)</li> <li>Content of threat suggests threatener may carry it out.</li> </ul>	<b>SEVERE RISK</b> <ul style="list-style-type: none"> <li>Possible confrontation by reporter</li> <li>Parental/guardian notification obligatory unless contraindicated</li> <li>Evaluate emergency notification to others (FERPA/HIPAA/Clery)</li> <li>No behavioral contracts</li> <li>Recommend interim suspension or paid/unpaid leave</li> <li>Possible liaison with local police to compare red flags</li> <li>Deploy mandated assessment</li> <li>Evaluate for medical/psychological transport</li> <li>Evaluate for custodial hold</li> <li>Consider voluntary/involuntary medical withdrawal</li> <li>Direct threat eligible</li> <li>Law enforcement response</li> <li>Consider eligibility for involuntary commitment</li> <li>SIVRA-35 or other violence risk assessment</li> </ul>
<b>EXTREME RISK</b> <ul style="list-style-type: none"> <li>Dysregulated (way off baseline) or medically disabled</li> <li>Threat made or present</li> <li>Threat is concrete (specific or direct)</li> <li>Likely to be repeated or shared with multiple reporters</li> <li>Information about threat or threat itself is consistent, plausible or includes specific detail of a plan (time, place, etc.), often with steps already taken</li> <li>Threat may be repeated with consistency</li> <li>Content of threat suggests threatener will carry it out (reference to weapons, means, target)</li> </ul>	<b>EXTREME RISK</b> <ul style="list-style-type: none"> <li>Possible confrontation by reporter</li> <li>Parental/guardian notification obligatory unless contraindicated</li> <li>Evaluate emergency notification to others</li> <li>No behavioral contracts</li> <li>Interim suspension or paid/unpaid leave if applicable</li> <li>Possible liaison with local police to compare red flags</li> <li>Too serious for mandated assessment</li> <li>Evaluate for medical/psychological transport</li> <li>Evaluate for custodial hold</li> <li>Initiate voluntary/involuntary medical withdrawal</li> <li>Law enforcement response</li> <li>Consider eligibility for involuntary commitment</li> </ul>

## Appendix F

### *Memorandum of Understanding (MOU) – Auraria Campus*

#### **MEMORANDUM OF UNDERSTANDING (MOU)**

by and between

The Auraria Higher Education Center, the Community College of Denver, Metropolitan State University of Denver, and the University of Colorado Denver

This is an MOU by and between the above listed organizations, hereinafter referred to collectively as the Auraria Campus Institutions.

#### **BACKGROUND and RATIONALE**

- Threat assessment and behavioral intervention teams have become an important and needed tool for learning institutions.
- The Auraria Campus Assessment and Response Team (CART) was created to allow the Auraria Campus Institutions to share information about students of concern in order to enhance the health and safety for the Auraria Campus.
- CART has identified several students of concern who have posed and continue to pose threats to the Auraria Campus (sexual assault, attempted murder, murder, kidnapping, assault, etc.).
- Several CART students have been adjudicated by their respective institutions and/or the courts and found responsible or guilty for violent and sexual offenses and have subsequently been suspended or expelled from their institution.
- Several of these students have then applied, been admitted, and enrolled at another Auraria Campus Institution and repeated the negative behaviors at their new institution and continue to pose a threat to the Auraria Campus.
- Currently, each Auraria Campus Institution includes language in their student codes of conduct that allow for exclusion from the Auraria Campus. However, once a student is granted admission at another Auraria Campus Institution the restriction is no longer enforceable, thus effectively overturning the initial decision of the conduct officer and allowing the student to be on campus.
- A new process that encourages additional sharing of information will allow for Auraria Campus restrictions to be honored by all Auraria Campus Institutions and empower the Auraria Police Department to assist in the enforcement of this restriction.
- Such a policy is intended to help protect all Auraria Campus Institutions and the Auraria Campus community from individuals known to pose a threat or risk.

#### **PURPOSE & SCOPE**

The purpose of this MOU is to establish a formal agreement, including the adoption of required processes and procedures at each Auraria Campus Institution, that prohibits a student suspended, expelled, or otherwise removed for violent, concerning, or threatening behavior from one Auraria Campus Institution from enrolling at another during the term of the suspension, expulsion, or removal. Furthermore, this MOU establishes processes so that the Auraria Campus Institutions honor sanctions of suspension (including interim suspension) and expulsion imposed by other Auraria Campus Institutions when the sanction is imposed due to a

student's violent or threatening behavior.

In particular, this MOU is intended to:

- Establish formal and agreed upon policies, procedures, and timelines for communicating when and why students are suspended, expelled, or otherwise removed for threatening and/or violent behavior.
- This policy will not impact the ability or autonomy of individual Auraria Campus Institutions or their conduct officers to make autonomous decisions concerning individual student conduct and sanctioning. Each Auraria Campus Institution shall retain its own processes and procedures.
- This MOU will only be used in situations where a student is suspended, expelled, or otherwise removed for threatening and/or violent behavior as defined above.
- Student privacy is an essential component of this process. All communications shall adhere to Family Educational Rights and Privacy Act (FERPA).

## **DEFINITIONS**

For the purpose of this MOU *SUSPENSION* shall be defined as:

**Suspension** – A distinct period of time and/or the specification that a student's relationship with an Auraria Campus Institution is severed temporarily, and the student must fulfill certain requirements before re-admission or re-enrollment will be considered. While suspended, the student is not allowed to attend classes, use campus facilities, or to participate in campus activities. Special conditions may be stipulated for reinstatement at the conclusion of the period of suspension.

**Interim Suspension** – Each Auraria Campus Institution shall have the authority to suspend on an interim basis, pending final disposition of the case, any student when, in the opinion of these officials, such a suspension is necessary to:

- a. Maintain order on the Auraria Campus;
- b. Stop interference in any manner with the public or private rights of others on Auraria Campus premises;
- c. Stop actions or potential actions that threaten the health or safety of any person; or
- d. Stop actions or potential actions that destroy or damage property on the Auraria Campus, or any Auraria Campus Institution location.

Interim suspension will also include excluding the student from the Auraria Campus. This exclusion begins immediately upon notice from the appropriate Auraria Campus Institution administrator. A conference with the conduct officer will be scheduled as soon as possible (usually within 10 calendar days) to determine how the case will continue and to begin the conduct process.

For the purpose of this MOU *EXPULSION* shall be defined as:

**Expulsion** – Permanent removal from an Auraria Campus Institution with no opportunity to return.

For the purpose of the MOU *STUDENT* shall be defined by each Auraria Campus Institution as determined by their process to hold an individual accountable through a Student Conduct or Administrative process that may result in suspension, expulsion, or removal from campus.

For the purpose of this MOU, *VIOLENT BEHAVIOR and THREATENING BEHAVIOR* s shall be defined as:

*Violent Behavior Includes, but is not limited to:*

- Any physical assault, with or without weapons.
- Behavior that a reasonable person would interpret as being potentially violent (e.g., throwing things, pounding on a desk or door, or destroying property).
- Specific threats to inflict harm (e.g., a threat to shoot a named individual), or use of any object to attack or intimidate another.

*Threatening Behavior includes, but is not limited to:*

- Physical actions short of actual contact/injury (e.g., moving closer aggressively, waving arms or fists, yelling in an aggressive or threatening manner).
  - General oral or written threats to people or property (e.g., "you better watch your back" or "I'll get you"), including the use of any electronic means.
  - Threats, even if made in a "joking" manner.
  - Stalking behavior.
- Implicit threats (e.g., "you'll be sorry" or "this isn't over yet").

## **MUTUAL COVENANTS and AGREEMENTS**

IT IS MUTUALLY UNDERSTOOD AND AGREED BY AND BETWEEN THE PARTIES THAT:

In the instance when an Auraria Campus Institution determines that a student shall be excluded from the Auraria Campus as the result of being suspended, expelled, or otherwise removed for threatening and/or violent behavior, each Auraria Campus Institution shall:

- The Auraria Police Department and Student Conduct Office at each Auraria Campus Institution shall be carbon copied on all letters/decisions regarding the suspension, expulsion, or removal of a student from one Auraria Campus Institution for violent, concerning, or threatening behavior via a student conduct, legal, or other administrative process.
  - This will ensure that the suspended or expelled student is aware that all Auraria Campus Institutions have received the information.
- A separate email communication shall be provided to the Office of Admissions, Office of the Registrar, and Student Conduct Office at each Auraria Campus Institution to create the needed hold/stops/indicators to prevent admission and enrollment. This shall be sent within three (3) days of the decision being made final (meaning no more appeal options remain) and shall include the following:
  - Full Name
  - Date of Birth



- Address
- Phone
  - Duration of suspension/expulsion/removal
- A hold, stop, or negative service indicator shall be placed on these student files preventing admission, enrollment, or other matriculation to the Auraria Campus during the term of the suspension or removal. System level holds, stops, or negative service indicators shall be made at the discretion of each Auraria Campus Institution.
- In cases where a student is suspended for potentially violent or threatening behavior on an interim basis, or where a conduct process will be taking place at the end of the semester with the possible outcome of suspension, expulsion, or removal, the respective Student Conduct Office shall communicate immediately with the Auraria Police Department and the Office of Admissions, Office of the Registrar, and Student Conduct Office at each Auraria Campus Institution and a temporary hold, stop, or negative service indicator shall be placed on the students file preventing admission, enrollment, or other matriculation until the completion of the student conduct, administrative, or other process.
- The Chair of CART shall maintain a list of all students suspended, expelled, or otherwise removed for violent or threatening behavior through a student conduct, legal, or other administrative process.
  - This list shall include the timeframes/deadlines for suspension and removal, the Auraria Campus Institution initiating the suspension, and reason for suspension.
  - At each monthly CART meeting, additions to the list will be reviewed to ensure the above steps have been completed and holds have been placed at all Auraria Campus Institutions.
    - Students whose term of suspension or removal is expiring will also be discussed. After each meeting the CART chair shall send a memo to the Office of Admissions, Office of the Registrar, and Student Conduct Office at each Auraria Campus Institution listing students cleared to have their holds, stop, or negative service indicator removed.
  - At the beginning of each semester the CART Chair shall work with the Auraria Campus Institutions to update all contact information for the appropriate staff members and offices.

#### **RELATED LAWS and POLICIES**

- The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99)]
- The Colorado Revised Statutes
- The Community College of Denver, Student Code of Conduct
- The Metropolitan State University of Denver, Student Code of Conduct
- The University of Colorado Denver, Student Code of Conduct

#### **MOU EFFECTIVE DATE AND REVIEW DATE**

This MOU shall be effective upon the signature of authorized officials. It shall be in force starting

on August 15, 2013. The parties indicate agreement with this MOU by their signatures. This MOU may be terminated by any party with reasonable notice and shall be reviewed annually with the first review being completed no later than August 2014.

**Signature Page**

**Memorandum of Agreement  
Suspension and Expulsion Policy & Agreement**

By signing this [MOA], all parties agree to all the terms and conditions contained herein and have executed and approved this [MOA] on the dates set forth below.

**METROPOLITAN STATE UNIVERSITY OF  
DENVER**

By: \_\_\_\_\_  
Stephen M. Jordan, Ph.D., President

Dated: \_\_\_\_\_, 2013

**AURARIA HIGHER EDUCATION CENTER**

By: \_\_\_\_\_  
Barbara Weiske, Executive Vice President for  
Administration

Dated: \_\_\_\_\_, 2013

**COMMUNITY COLLEGE OF DENVER**

By \_\_\_\_\_  
Cliff Richardson, Interim President

Dated: \_\_\_\_\_, 2013

**UNIVERSITY OF COLORADO DENVER**

By: \_\_\_\_\_  
Don Elliman, Chancellor

Dated: \_\_\_\_\_, 2013