

# {Care Team Manual}

#### **Community College of Denver**

Downtown Auraria Campus Health Sciences Center at Lowry Advanced Manufacturing Center



Updated July 2019

## **Care Team Manual**

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

#### Contents

Introduction	
Care Team Mission	4
Purpose	4
Operational Guidelines	5
Goals	5
Scope	6
Historical Context	6
Team Membership	6
Training	8
Expectations	8
Definitions	9
Internal Communication	
Phone and Email	10
Meeting Frequency	11
Data Tracking Systems	11
Meeting Notes	11
Sole Possession Notes	11
Disability and Health Records	
External Communications	
Reporting to the Care Team	12
Response and Follow Up	

Additional Outreach Methods	
Record Keeping	
Record Retention	
FERPA and Record Privacy	
Reporting Recommendations & Responsibilities	16
Procedural Overview	17
Amnesty Clause	
Campus Notifications	17
Mandated Assessments	18
Interim Suspension and/or Involuntary Withdrawal	19
Re-Enrollment	
Behaviors that may result from a condition of disability	
Risk Management Process	20
Community Outreach	21
Community Membership	22
Program Assessment	22
References	23
Appendices	
Appendix A	25
GAP Analysis	25
Appendix B	
Sample Outreach Letter	
Appendix C	29
Care Team Response Flow Chart	
Appendix D	30
Sample Care Report Form	
Appendix E	
NaBITA Threat Assessment Tool	
Appendix F	
Memorandum of Understanding (MOU) – Auraria Campus	

#### Introduction

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 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 at minimum 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 (ATAP), 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 behavioral intervention and threat assessment team for Community College of Denver, including Auraria campus and locations at Lowry and the Advanced Manufacturing Center.

#### Historical Context

The Community College of Denver's Care Team was established in 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 an academic dean and has since altered a few times with the creation of new positions including Care case manager and Director positions. As of summer 2018, the Director of Student Conduct and Support is the chair of the Care Team. In the Director's absence, Care Case Managers step in.

#### Team Membership

The Community College of Denver's Care Team operates under the division of Enrollment Administration and Student Success (EASS) through the department of Student Conduct & Support. Care Case Managers are physically housed in the Tivoli Student Union in the Office of Student Conduct & Care suite. There are two professional staff serving in dual Student Conduct Educator & Care Case Manager roles as well as a Care Team Intern (when filled, by academic year). Care Case Managers and the Care Team Intern directly report to the director of Student Conduct & Support. Charged by CCD executive leadership, the team's actions are under the guidance of the vice president for Enrollment Administration and Student Success.

Standing members include:

- Chair: Director of Student Conduct & Support
- Student Conduct Educator and Care Case Managers (Members)
- Care Team Intern (Member)
- Auraria Campus Police Department (ACPD), Law Enforcement Representative (Member)
- Academic Representative(s) (Member)
- Dean(s) from EASS division (Member)
- Accessibility Center Representative (Member)
- Human Services Coordinator (Member)
- Human Resources/Title IX/Equal Opportunity Representative (Member)
- CCD Counseling Administrator (Member)
- Mental Health Agency Consultant (Member)\*

\*The role of the mental health agency clinician on the CCD Care Team is in the capacity as a consultant. The clinician may provide contextual information, which may assist in identifying symptomatic behaviors and general suggestions of support in working with individuals of concern. The mental health clinician may provide case scenarios for the Care Team to review in anticipation of future concerns or as a result of recent situations.

The mental health agency clinician role is NOT to be utilized as a counselor for the Care Team. They will not be direct referral source for the Care Team, nor will they counsel individual members of the Care Team.

Licensed clinicians (CCD Counseling Administrator and Mental Health Agency Consultant) have the responsibility to work with Care Team chair to determine what level of participation they may choose to have on the team in addressing a specific counseling client's case. The Care Team will not ask the mental health clinician to break the confidentiality of counselor/client privilege. They will not request such information to be disclosed in order to maintain membership, nor will the Care Team expect the clinician to investigate, question, research, analyze, and/or diagnosis an individual in follow up to an existing case.

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

- Legal Counsel for the Colorado Community College System
- Title IX/Civil Rights Investigator
- Lowry Campus representative
- Advanced Manufacturing representative
- The Phoenix Center of Auraria representative
- LGBTQ Student Resource Center representative
- Off Campus Auraria Housing affiliates
- Auraria campus partners (e.g. 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 and/or what communication needs to occur at another time.

### Training

Care Team members will be provided with initial and ongoing training to become familiar with behavioral intervention teams (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 BITs. Each member on the team should feel competent in utilizing Maxient, the management system of all Care cases. The Chair or a Care Case Manager may be called upon to facilitate such trainings one-onone with members or to the larger body. Care Team members should have an understanding of the Family Educational Rights Privacy Act (FERPA) and its application in the role of the Care Team. Additionally, it is the responsibility of each member 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/regularly scheduled meetings.
- Review and familiarize with current cases listed on the Care agenda prior to attending, as it pertains to your role.
  - 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 Team's recommendations in an individual's action plan.
- Maintain the privacy of students, staff, and faculty, and follow established processes.
- Communicate directly with the Chair should their standing or presence on the Care Team alter from the directives listed above (including but not limited to: 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 and Lowry. 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 their 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 should be notified immediately at 303.352.3205. The Chair will attempt to reach Care Team members through email and their direct office phone lines to convene an ad hoc meeting when needed. 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 is not present, unavailable, or unable to respond to an urgent concern, Care Case Managers should be contacted in the Office of Student Conduct and Care. 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's Care Team meets regularly (nonemergency), generally once a week for up to one and a half hours. Exceptions may be weeks with system-approved holidays, term breaks, or summer term when meetings may occur every other week. The 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 Maxient software to maintain Care Team records. Additional academic records or other information related to the student's specific Care case may be accessed through Navigate, Banner, Colorado Crisis Center's (Auraria Crisis Line's) reports, Campus Assessment and Response Team (CART) agendas, Auraria campus crime logs, Lowry security reports, Colorado Bureau of Investigation state arrest records, and police reports.

### Meeting Notes

The Care Team member assigned to the individual's Maxient Care case is responsible for documenting case notes for each Care meeting at which the case was discussed. These notes should include updated demographic information about individuals listed in cases, actions the Care Team has already taken (unless noted previously), actions that will be taken, and requests for what further information is needed. Individual members of the Care Team may also input notes on relevant interactions directly into Maxient and should also advise the Chair and the Care Case Manager assigned to the case (if applicable) of any updates.

#### Sole Possession Notes

Care Case Managers (CCMs)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 CCMs(s) have established with individuals-of-concern 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. These notes should not be uploaded into Maxient, the shared network, or shared with any individuals. "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 ADA privacy rules allow for Accessibility Center (AC) 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 this disability-related or medical treatment information from the AC 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 Office of Student Conduct & Care in addition to submitting 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 CCD.edu/Care website or by calling 303.352.3205.

#### Response and Follow Up

The Maxient database is set up to automatically send a confirmation to the reporting party that a report has been successfully sent to the Care Team and will be reviewed soon.

Care reports will be reviewed within one working day and will be assigned to a Care Case Manager (which may include the Director, Care Team Intern, or another member of the Care Team). After review and when possible and needed, the Care Case Manager assigned to the case will personally follow up with the reporting party to clarify the report, gather additional information, and offer appropriate support to the reporting party.

The Care Case Manager, in consultation with the Director/Chair, will determine appropriate next steps which may include:

- outreaching to the individual-of-concern,
- collecting additional information,
- keeping the case as informational without action from the Care Team (such as if the reporting party is a faculty or staff member actively and effectively supporting the student),

- requesting intervention from another CCD department, and/or
- referring the case to Student Conduct, Title IX/Equal Opportunity, campus police, or the student grievance process (if appropriate or required).

In most cases, the assigned Care Case Manager will outreach to the individual-of-concern, and will do so within one working day of being assigned the case. (When possible, outreach will occur the same or next working day of the Care report submission.) Outreach is made with the intention of scheduling the individual for an in-person meeting with the Care Case Manager. Meetings are generally held in the Office of Student Conduct & Care and may be held remotely at an alternative campus location or over the phone if needed and appropriate.

Outreach to students may appear as follows:

- First Attempt: Email sent via Maxient to the individual's email account (@student.cccs.edu if a CCD student)
  - May also include a text message via Maxient notifying student of the letter, when student has a current cell phone number in the system
  - If the situation is escalated and/or there is imminent concern, a direct call or on-the-scene response will occur first or in addition to the email.
- Second Attempt: Should occur within two days of initial outreach 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 five to seven working days later.
- Fourth/Final Attempt: Three to seven working days after the previous attempt, a final email including CCD or community resource information will be sent to the student via Maxient.

#### Additional Outreach Methods

Should the attempts to outreach be unsuccessful the following may occur at any time during the outreach process, depending on the severity of the concern:

 The case manager may reach out to the student's instructors to organize a date/time to connect with the student during or immediately after 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 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 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.).
- Depending on the content and if this is the student's first Care report or their first Care report in a year, and there are no escalating concerns, the Chair may decide to close the case and mark it as informational.
- In urgent or immediate situations, the Chair or case manager (in consultation with the Chair) may attempt to pull the student out of class, request a welfare check from their local police department, and/or contact the student's emergency contact (if listed).

#### **Record Keeping**

Care records come in multiple forms: incident reports, communication, and supporting information. All of these information pieces should be submitted in a timely manner to the Maxient database system. Theassigned 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 and personal opinions. Records should consistently be unaltered fact and 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 Releases of Information.

**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 audits, and more.

Care Team discussion notes should also be included in the Maxient Care case documentation. Any Care Team agendas or minutes kept separately from Maxient should also be considered documentation and kept in the shared drive for private access by the Care Team.

#### **Record Retention**

These Care records should be retained for at least seven 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, and should 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 Community College of Denver (CCD), University of Colorado Denver (CU Denver), Metropolitan State University of Denver (MSU Denver), and the Auraria Campus Police Department (ACPD) 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 report to the Care Team in a timely manner. Students are also encouraged to submit reports for any individuals of concern. Areas of concern recommended to be reported include, but are not limited to:

- Absenteeism (excessive and/or unusual, from class or work)
- Accidental overdose
- Alarming statements referencing bombs, firearms, ammunition, other weapons, etc. (may include a significant interest in using, obtaining, or glamorizing these items)
- Bias-motivated incidents and discrimination
- Classroom disruption
- o Death of a student, their relatives, guardian, and/or significant other
- o Demonstrations of distress, grief, anger, or unpredictable behavior
- Disappearances, missing persons, kidnappings
- Extreme disrespect or insubordination to faculty and/or staff
- Harassment (physical, verbal, emotional, or sexual)
- Hospitalizations for mental health or significant health concerns
- Interpersonal violence (dating, domestic, and relationship violencemust 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.)
- o Paranoia
- Self-injury (may include cutting, burning, etc.)
- Substance abuse
- Suicidal thoughts and ideation, suicide attempts
- o 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 Campus 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 with a student in the event of an immediate and/or imminent threat. This waiver would be granted through approval of the director of Student Conduct & Support and/or the vice president for Enrollment Administration and Student Success, acting in accordance with law enforcement's recommendation for emergency response or other information. Should an individual be deemed to interfere with campus safety and be removed from campus, a student may be: banned from campus on an interim basis pending a student conduct process, or will be subject to review of BP 4-10 policy through the Office of Student Conduct & Care.

### Amnesty Clause

Individuals meeting with the Care Team may be granted amnesty for minor student misconduct (such as low-level alcohol or drug violations) related to the given case. This decision would be at the discretion of the Chair/director of Student Conduct & Support. 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 & Care: a student of concern notification or a CCD/Auraria campus ban. All notifications and bans will provide information on the student's 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 Campus 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 (OSC) and is typically tied to a violation or alleged violation of the Student Code of Conduct. A campus can have two levels, 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, and may indeed be permanent or may be released at a later date per OSC (e.g. when a student's suspension period has ended and they have completed all outstanding sanctions). This type of ban may or may not be tied to safety concerns. When a ban is placed, the Auraria Campus 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 Campus 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 may be absorbed by Community College of Denver, should the individual be experiencing undue hardship and unable to pay for the assessment, and CCD has the ability to do so. 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 individual's 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 & Care. 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. Unless otherwise stipulated by the Office of Student Conduct, 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 Chair, 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 a Care case manager, or referrals to the Office of Student Conduct.

Referrals may be made to campus partners such as student life - human services, the Phoenix Center of Auraria, financial aid, the cashier's office, the accessibility and/or advising centers. Additionally, referrals may also be issued to community agencies like Colorado Crisis Partners, 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
- I. Online presence such as social media
- m. 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, .
    - i. Implement necessary interventions through Student Conduct & Support, law enforcement, or other means
    - ii. If necessary, request additional information through a forensic or psychological risk assessment process
    - iii. Utilize the SIVRA-35 Threat Assessment Tool (NaBITA)

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.
- Report to Auraria Campus 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 and outside trainings on Care related topics
- Acting as a referral source for campus and community resources
- Consulting on conflict resolution
- Sponsoring "Active Shooter" and other violence prevention trainings

- Coordinating 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 representation on the Campus Assessment and Response Team (CART) monthly meetings. The Care Team will have a representative present at the Auraria Mental Health monthly meetings and the Auraria Emergency Preparedness, Coordination and Recovery Committee (EPCAR) meetings. Professional staff in the Office of Student Conduct and Care may also consult and confer with UCDenver and MSU Denver colleagues from respective Dean of Students offices on specific cases and overall best practices.

#### **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.

Community College of Denver (2016). *Mission Statement*. https://www.ccd.edu/about-ccd/vision-mission-strategic-plan

Framingham, J. (2014). What is Psychological Assessment. Psychcentral.com

Jed Foundation (2013). *Balancing Safety and Support On Campus: A Guide for Campus Teams. Ny, NY: Jed Foundation*.

Lewis, S. & Schuster, S.K., Sokolow, B.A. (2014). *BIT Recordkeeping Best Practices and Model Policy (Webinar).* 

Sokolow, B. A., Lewis, S. W., and Schuster, S. K. (2011). *Threat, threat, threat, threat, or threat.* NaBITA.

\*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: Spring 2016/2018 with Updates July 2019
- B. Sample Outreach Letter
- C. Care Team Response Flow Chart
- D. Sample Care Report
- E. NaBITA Threat Assessment Tool 2019
- F. Memorandum of Understanding (MOU) Auraria Campus

#### Appendix A

#### **GAP** Analysis

Spring 2016/2018 - Updates July 2019

We have identified the following areas that require further development for effective management of this Care Team.

- A "Duty to Report" Clause: 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 best practices for reporting standards (ATAP, HECMA, NaBITA) and on reflection of local Colorado incidents including the Arapahoe High School Shooting report and the University of Colorado Denver's Care Team review of the James Holmes case.
  - Update July 2019: There is still no official "Duty to Report" policy or clause other than the CSAs and responsible employees. Steps and progress have been made regarding messaging to staff and faculty about reporting expectations and best practices.
    - Training language from Human Resources including materials for New Employee Orientation D2L modules state it is the responsibility of staff and faculty to report concerns to the Care Team.
    - There are Student Conduct and Care Team modules that new full-time staff and faculty are required to view.
    - The Care Team commits to continuing to work on this gap. This will include specifying concerning behaviors that the clause should include, gathering information from the Auraria universities on if they have a Duty to Report clause related to their BITs, and bringing this to the President's Cabinet for discussion in Fall 2019.
- A formalized record expungement procedure: The Care Team recommended that CCD conduct a review of best practices for expungement of Care records that is in alignment with the Office of Student Conduct & Support, 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.

- Update July 2019: No change in status. CCCS plans to update its student code of conduct so this could be a potential inclusion in that revision. Either way, this needs to be addressed.
- Ongoing Assessment & Program Audit: In continuation to the existing satisfaction survey's established in fall 2015, the Care Team would recommend structuring and executing an audit of the Care Team and its practices that would aid in establishing a long-term assessment plan. This plan should review the Care Team's 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 state of current mental health services. Additionally, the Care Team should continue to track student satisfaction and retention rates through ongoing assessment strategies.
  - Update July 2019: Assessment projects are in progress for the 2017-2018 and 2018-2019 academic years. CCD was recently approved for a four-year JED Foundation grant which will include an assessment year to begin Fall 2019.
- Continue to support the growth and development of the CCD Counseling Center: Offer assistance, data statistics, and staffing support to further initiatives set by this office in continuing to bridge the demand of mental health resources for students of the CCD community.
  - Update July 2019: The Counseling Center recently completed its second academic year. In January 2018, we created a Counseling Administrator position which is a licensed clinician and still part-time, contracted. An Administrative Assistant III position was updated with its posting to serve as primary reception for the Counseling Center, providing consistent administrative support (July 2019 start date). Needs will continually be assessed by the JED Foundation grant mentioned above.
- 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 Senior 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 through the JED foundation and the Higher Education Mental Health Associations (HEMHA) best practices.

- Update July 2019: No progress has been made on this recommendation. The Office of Student Conduct and Care was restructured after the departure of the Senior Care Case Manager in May 2018, creating two dual Student Conduct Educator and Care Case Manager roles and charging the Director of Student Conduct and Support with chairing the Care Team. This should be reassessed through the JED Foundation relationship starting Fall 2019. At this time Care Team also recommends the following:
  - "CCD Community" in the above should be further defined.
  - CCD's Emergency Planning committee should be involved in this planning, and the next Director/chair of Care Team should be added to that committee.
- Reporting structure for staff, adjunct, and faculty concerns: In collaboration with Human Resources, seek to establish a reporting standard for personnel concerns brought to the attention of Human Resources, which may present risk factors. Identify whether the current structure of the existing Care Team is best practice for addressing such concerns, or whether a separate F&S Care Team would be better implemented. What should the meeting structure and format for referrals look like? Any other procedures for implementation should be reviewed at this time.
  - Update July 2019: This should continue to be discussed and determined. The Director of Student Conduct and Support and the Director of Human Resources communicate and continue to work together when there is a faculty or staff of concern. These cases are generally still referred to Human Resources. Human Resources heavily uses CCD Legal Counsel and the Colorado-State Employee Assistance Program (C-SEAP). They are minimal in numbers, particularly compared to reports about students of concern. Care Team recommends the following:
    - Specific criteria needs to be created for Human Resources to bring a staff or faculty case to the standing Care Team (e.g. credible threats).
    - There are not currently enough cases to warrant a separate team.

## Appendix B Sample Outreach Letter

#### DATE

{{Student's Full Name}} Sent electronically to {{Student's CCD Student Email Address}},

#### PERSONAL AND CONFIDENTIAL

Dear {{FIRST\_NAME}},

In supporting students and the Community College of Denver (CCD) community, the Care Team receives and responds to notifications of students who may be experiencing significant life stresses and/or concerning behaviors. The Care Team is here as a support and resource reference for students to help address these stresses and concerns while in their academic pursuits.

I am reaching out to you specifically as I was made aware you might be in need of some support connecting with resources related to {{Topic Areas}}. I would love to meet with you, 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 "Care 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.

If you need language translation or 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 ahead of time as we may need notice to accommodate your needs. Si necesita un traductor quien habla español, por favor notifique a nuestra recepción de este alojamiento.

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, and look forward to meeting you and hearing your story.

Sincerely,

NAME, Care Case Manager Community College of Denver

#### Appendix C

Care Team Response Flow Chart



**Figure 1.** A flow chart outlining procedure for response to incidents of NaBITA level 3 or higher.

## Appendix D Sample Care Report Form



#### Care Team Referral Form

Thank you for sharing your concerns for a student or employee at the Community College of Denver.

BEFORE YOU BEGIN: If this is an emergency that involves an imminent risk of harm to self or others, please FIRST contact Auraria Campus Police Dept (ACPD) at 303-556-5000 or 911 from a campus phone. The Auraria Mental Health Line (303-615-9911) may also be used for immediate mental health crises or victim support, by the person in need or for consultation about concerns.

Referrals are reviewed during normal business hours and are not monitored after hours, on weekends, or during observed holidays/breaks. While referrals from this form are reviewed by a variety of campus partners working to assist students and employees, it is NOT designed for emergency response situations.

For assistance or consultation while completing this referral, please contact professional staff in the Office of Student Conduct and Care (303-352-3205).

#### Please share with us your information

If you wish to make an anonymous report of concerning or worrisome behavior, a case manager will evaluate the report and determine what follow up (if any) is necessary to address the concerns. Please consider providing your name and contact information to allow us to call or email if we have additional questions regarding your report.

Your full name:		
Your position/title:		
Your phone number:		
Your email address:		
Nature of this report (Required):	Please Choose	v
Date of incident (Required):	YYYY-MM-DD	
Time of incident:		
Location of incident (Required):	Please select a location	-
Specific location:		

**Person of Concern** 

Please list the individuals involved, including as many of the listed fields as you can provide. For individuals who are not affiliated with CCD please provide a Drivers License number in the block labeled SID (Student ID #)if available. If you have listed your information as the person submitting the report, you DO NOT need to include your information below.

Name	Select Gender		Select Role		Student ID Number
	Please choose	Ψ.	Please choose	T	
Phone number	Email address				

#### Add another

#### Tell us a little more...

This form can be used for self-referral, or for the purpose of reporting a concern or incident about the behavior of others. Please use the the narrative section below to provide detailed information regarding the concern you are reporting. Once the form is received, the Care Team will review the report and take any action as appropriate. Given the nature of these concerns, we may not be able to offer information in regards to the needs and services addressed with individuals. However, if you should have questions about the general process or how to provide additional support, please feel free to contact the Care Team by phone at 303-352-3205.

Please describe the behaviors that have prompted you to share your concerns. Please use as much detail as possible, including dates for any specific concerns. If the concern involves threats or comments related to self-harm or harm to others, please include exact quotes and how these comments were communicated). Please include information on any action taken to address the concern, if applicable. (Required)

Based on the description you provided, please check any behaviors below that have led you to be concerned about the individual involved (optional). (Required)

- Absenteeism
- Academic Support
- Administrative Support
- Disruption
- Disturbing material in class (projects,
- paperwork, & presentations)
- Disturbing material out of class (social media,
- emails, voicemails, etc.)
- Family Support
- Financial Assistance
- Food Assistance
- Housing Assistance
- Human Services Other
- Legal Resources

- Interpersonal Violence Reporting Party
- (Complainant) Support
- Interpersonal Violence Responding Party
- Support
- Interpersonal Violence Victim Support
- (Domestic Violence, Stalking, Harassment,
- Assault)
- Reporting Assistance (Grievance, Civil Rights, Title IX, Student Conduct, etc.)
- Medical Hospitalization for Medical Concern
- Medical Illness with Academic/Campus
- Impact
- Medical Physical Injury
- Mental Health Bizarre/Disjointed Thoughts
- Mental Health Clinical/Counseling Referral
- Mental Health Communicating Threats to
- Self/Others
- Mental Health Depression and/or Prolonged
- Sadness
- Mental Health Eating Disorder

- Mental Health Experiencing the recent loss
- of a family member/loved one/friend
- Mental Health Expressing Significant Stress
- and/or Anxiety
- Mental Health Homicidal Ideation
- Mental Health Hostile/Intimidating Behavior
- Mental Health Inappropriate Mood
- Regulation
- Mental Health Mental Health Hospitalization
- Mental Health Obsessively
- Suspicious/Paranoid
- Mental Health Self-Harm
- Mental Health Suicidal Ideation
- Mental Health -Substance Use (Alcohol,
- Marijuana, Illicit Drugs)
- Other Support/Misc.

Is the individual aware you have submitted this report? (Required)

YesNo

Supporting Documentation				
Please upload any documents, ima Attachments require time to uploa				ize.
Choose files to upload	Choose Files			
One last step				
Help us NOTE: If you do not see a gray box with		<b>reports</b> by completing this captcha. It says "I'm not a robot", please try a different web browser.	I'm not a robot	reCAPTCHA Prisey-Terma
		Email me a copy of this report		
		Submit report		

**Figure 2.** A Care Team Referral Form found at ccd.edu/care to be submitted by the referrer.

#### Appendix E

#### NaBITA Threat Assessment Tool 2019



**Figure 3.** Behaviors and indicators of threat levels to one's self or others and a general risk rubric.

#### INTERVENTION OPTIONS TO ADDRESS RISK AS CLASSIFIED

#### CRITICAL (4)

- Initiate wellness check/evaluation for involuntary hold or police response for arrest
- Coordinate with necessary parties (student conduct, police, etc.) to create plan for safety, suspension, or other interim measures
- Obligatory parental/guardian/emergency contact notification unless contraindicated
- Evaluate need for emergency notification to community
- Issue mandated assessment once all involved are safe
- Evaluate the need for involuntary/voluntary withdrawal
- Coordinate with university police and/or local law enforcement
- Provide guidance, support, and safety plan to referral source/stakeholders ELEVATED (3)
- Consider a welfare/safety check
- Provide guidance, support, and safety plan to referral source/stakeholders
- Deliver follow up and ongoing case management or support services
- Required assessment such as the SIVRA-35, ERIS, HCR-20, WAVR-20 or similar; assess social media posts
- Evaluate parental/guardian/emergency contact notification
- Coordinate referrals to appropriate resources and provide follow-up
- Likely referral to student conduct or disability support services
- Coordinate with university police/campus safety, student conduct, and other departments as necessary to mitigate ongoing risk

#### MODERATE (2)

- Provide guidance and education to referral source
- Reach out to student to encourage a meeting
- Develop and implement case management plan or support services
- Connect with offices, support resources, faculty, etc. who interact with
- student to enlist as support or to gather more information Possible referral to student conduct or disability support services
- Offer referrals to appropriate support resources
- Assess social media and other sources to gather more information
- Consider VRAW<sup>2</sup> for cases that have written elements
- Skill building in social interactions, emotional balance, and empathy; reinforcement of protective factors (social support, opportunities for positive involvement)

#### MILD (0/1)

- No formal intervention; document and monitor over time
- Provide guidance and education to referral source
- Reach out to student to offer a meeting or resources, if needed
  Connect with offices, support resources, faculty, etc. who interact
- with student to enlist as support or to gather more information

ELEVATED

CRITICAL





© 2019 National Behavioral Intervention Team Association

Figure 4. Possible indications of risk level and intervention tools to address corresponding risk levels.

#### Appendix F

## Memorandum of Understanding (MOU) – Auraria Campus MEMORANDUM OF UNDERSTANDING (MOU)

by and between

The Auraria Higher Education Center, 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:
  - o Full Name
  - Date of Birth
  - Address
  - o 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

## AURARIA HIGHER EDUCATION CENTER

By:\_\_\_\_\_

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

Barbara Weiske, Executive Vice President for Administration

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

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

2013

#### COMMUNITY COLLEGE OF DENVER

## UNIVERSITY OF COLORADO DENVER

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

2013

By:\_\_\_\_\_

Don Elliman, Chancellor

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