

## THE UNIVERSITY OF ALABAMA IN HUNTSVILLE

### BEHAVIORAL EVALUATION AND THREAT ASSESSMENT (BETA) POLICY

<b>Number</b>	06.08.07
<b>Division</b>	Finance and Administration – Office of Risk Management and Compliance
<b>Date</b>	May 2015; Revised November 11, 2021
<b>Purpose</b>	The University of Alabama in Huntsville (“UAH or University”) is committed to promoting a safe, respectful, and non-threatening campus environment. Intimidating, threatening, and/or potentially violent behaviors are disruptive to UAH’s objective of a secure atmosphere for its students, faculty, staff, and visitors. The Behavioral Evaluation and Threat Assessment (BETA) Team’s mission is to provide a proactive, coordinated, and planned approach to the identification, assessment, management, and, where possible, reduction and/or prevention of behavior that falls into the HIGH (EMERGENCY), MODERATE, and LOW Level of Concern classifications (see definitions in section VI below).
<b>Policy</b>	<p>While it is impossible to eliminate all risk, the following BETA guidelines are designed to educate members of the UAH community (students, faculty, staff, and visitors) on how to report alarming/threatening behavior and/or potentially violent acts and how this information will generally be assessed and analyzed. UAH considers any situation in which an individual presents a violent risk to the campus community as serious in nature. UAH encourages all members of the campus community to maintain a reasonable concern for their own self-welfare as well as the welfare of others.</p> <p><b>Report emergency situations involving behavior that appears to pose a clear and immediate threat of violence or self-harm immediately to UAH Police (UAHPD) by dialing 256- 824-6911 or 911.</b></p>

#### I. REPORTING PROCEDURES

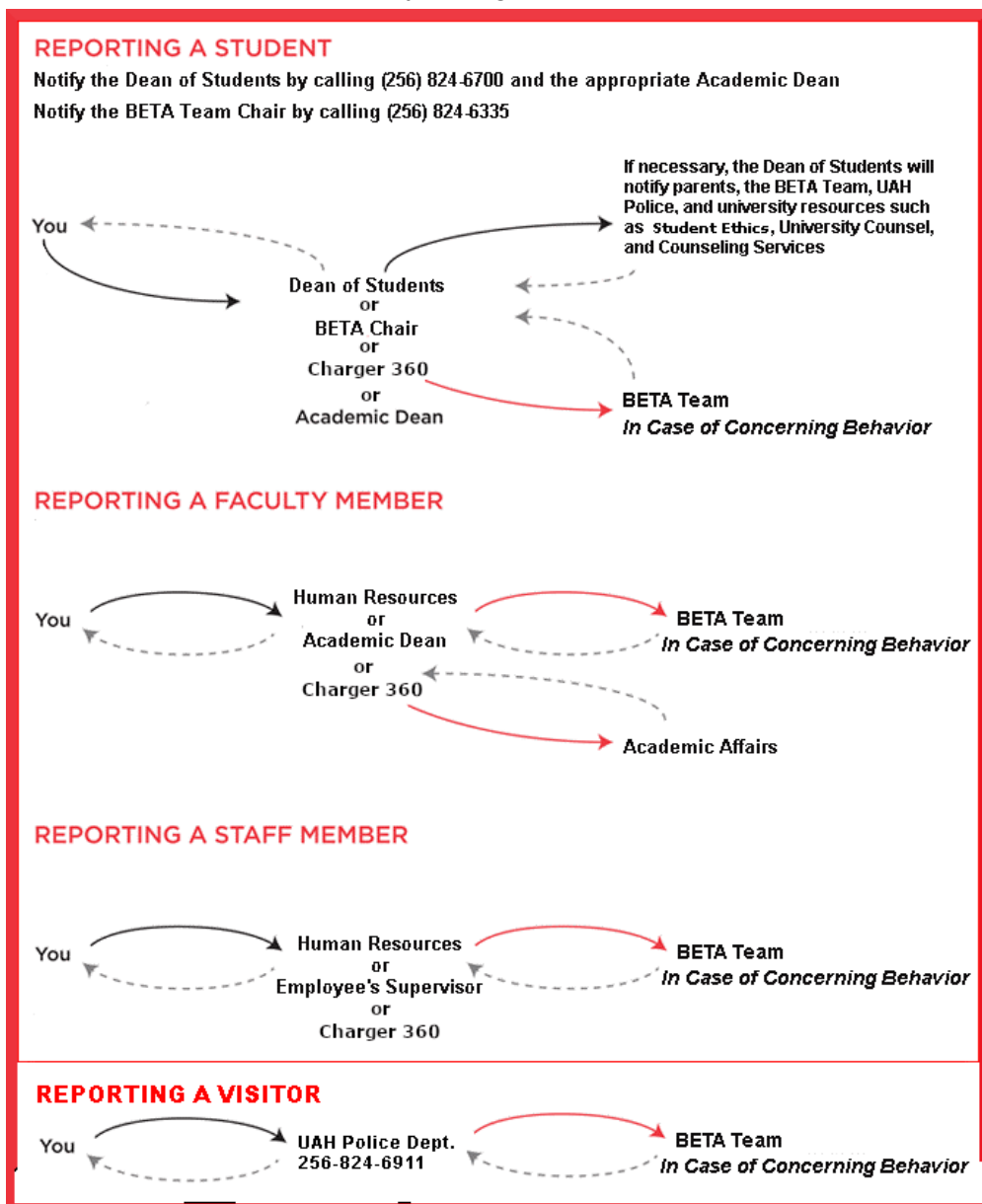
For situations where there does not appear to be an immediate risk, reporting instructions are below:

- A. Reporting a Student** - Reports of concerning student behavior should be made to the Dean of Students by calling (256) 824-6700, the appropriate Academic Dean, the BETA Chair (256) 824-6335, or by submitting a Charger 360 Person of Concern report. If necessary, the Dean of Students will notify parents, the BETA team, UAHPD, and university resources such as Student Ethics & Education, University Counsel, and Counseling Services.

**B. Reporting a Faculty Member** - Reports of concerning faculty members' behavior should be made to Office of Human Resources by calling 256-824-6545 and the appropriate Academic Dean, or by submitting a Charger 360 Person of Concern report. Human Resources or the Academic Dean will notify the BETA Team.

**C. Reporting a Staff Member** - Reports of concerning staff members' behavior should be made to the Office of Human resources by calling 256-824-6545, the employee's supervisor, or by submitting a Charger 360 Person of Concern report. Human Resources or the Employee's Supervisor will then notify the BETA Team.

**D. Reporting a Visitor** - Reports of concerning visitor behavior should be made to UAHPD by calling 256-824-6911.



## **II. MISSION AND GOALS**

The BETA Team's mission is to provide a proactive, coordinated, and planned approach to the identification, assessment, management, and, where possible, reduction and/or prevention of behavior that falls into the HIGH (EMERGENCY) Level of Concern, MODERATE Level of Concern, or LOW Level of Concern classifications defined below. Key objectives for the team include:

- Providing a repository for information about behavioral concerns across different campus units so as to identify persons in distress as early as possible;
- Facilitating timely communication among different campus units about individual behavioral concerns;
- Investigating or gathering additional information about individuals of concern, including individuals outside of the University community;
- Assessing the information so that the University can devise an appropriate response;
- Recommending interventions, threat management plans, active monitoring plans, and other case management strategies that connect individuals of concern with needed resources;
- Recommending plans for reintegrating a subject once initial actions are complete and the threat eliminated;
- Assisting with the education of the campus community about the types of behavior or concerns that they should report to team members; and
- Developing policy recommendations based on an evaluation of data on individual behavior dealt with by the team.

## **III. COVERAGE**

These guidelines shall apply to all UAH students, faculty, staff, and visitors. These guidelines also apply to activities and events that occur on UAH-owned and/or controlled property, buildings, premises, facilities, etc. and to activities and events, regardless of the location, sponsored by UAH or by any UAH-recognized organizations.

These guidelines are not intended to be a set of inflexible requirements, nor are they intended to limit the appropriate discretion of officials as warranted by the specific circumstances of a particular individual/incident. The BETA Team is a problem-solving resource and not a replacement for appropriate managerial action. These guidelines do not provide for adjudication of misconduct by, discipline of, or imposition of sanctions on UAH students, faculty, staff, or visitors. Such action may be taken against individuals whose behavior is addressed under these guidelines pursuant to UAH's student, faculty, or staff disciplinary policies and procedures as well as applicable

federal, state, or local laws. These guidelines do not have the force and effect of law.

#### IV. RELATED POLICIES AND RESOURCES

- [UAH Campus Safety and Security Information](#)
- [UAH Faculty Handbook](#)
- [UAH Staff Handbook](#)
- [UAH Student Handbook](#)
- [UAH Student Housing Guide to Residence Living](#)
- [UAH Emergency Action Guidebook](#)
- [UAH Title IX Sex Discrimination, Sexual Harassment, and Sexual Violence Policy](#)

#### V. CONTACTS

The UAH BETA Team, in consultation with the Office of Dean of Students (for student concerns), the Office of Academic Affairs (for faculty concerns), Human Resources (for staff concerns), and/or the UAHPD (for visitors and behavior indicating a HIGH (EMERGENCY) Level of Concern), shall implement these guidelines and shall revise or modify them as necessary to meet the changing needs of the UAH community. Please direct procedural questions to the Chair of the BETA Team.

- Academic Affairs Office: 256-824-6335
- Associate Provost / Chair of the BETA Team: 256-824-6335
- Campus Police Department (non-emergency): 256-824-6596
- Human Resources: 256-824-6545
- Office of Dean of Students: 256-824-6700

The following provides a list of departments that may be helpful for questions:

- Police Department / Emergency: 256-824-6911
- Police Department / Non-emergency: 256-824-6596
- Counseling Services: 256-824-6203
- Student Health Center: 256-824-6775
- Faculty & Staff Clinic: 256-824-2100

The following community resources are available within the cities of Huntsville, Madison, and North Alabama:

- Mental Health Center of Madison County: 256-533-1970
- Crisis Hotline (24 hours): 256-533-1970
- Crisis Services of North Alabama: 256-716-1000
- Children's Advocacy Center: 256-533-KIDS (5437)
- Downtown Rescue Mission: 256-536-2441

## VI. DEFINITIONS

**Threat:** An intention, whether expressed or implied, to inflict physical injury or damage on or take hostile action with respect to an individual (oneself or another), a group of individuals, or property, whether the person communicating the threat has the ability to carry out the threat, whether the threat is made on a present, future, or conditional basis, or whether the threat is made in person, through another person, in writing, over the phone, in the mail, electronically, or by any other means.

**Threat Management Plan:** An active, individualized case management plan based on information gathered in an investigation and on other facts known about the subject(s). It is intended to help de-escalate, contain, or, if possible control a subject who has exhibited behavior(s) classified by the BETA Team as “HIGH (EMERGENCY) Level of Concern” as defined below; to decrease the vulnerabilities of possible targets of such behaviors; to discourage escalation of the circumstances; and to prepare for and mitigate against precipitating events that may trigger such behaviors.

**Active Monitoring Plan:** An active, individualized case monitoring plan based on information gathered in an investigation and on other facts known about the subject(s). It is intended to facilitate the monitoring of a subject who has exhibited “MODERATE Level of Concern” behavior as defined below and to provide for periodic re-assessment of a subject’s behavior and corresponding potential threat level. Active monitoring may also be used as follow-on to a HIGH (EMERGENCY) Level of Concern threat management plan once a threat has diminished to MODERATE Level of Concern to ensure that behavior is effectively managed.

**HIGH (EMERGENCY) Level of Concern:** Behavior that appears to pose a clear and immediate threat of violence or self-harm, and requires immediate containment. It requires law enforcement, target protection, and development of a threat management plan. It includes, but is not limited to:

- Possession of unauthorized weapons (guns, knives, etc.) on campus;
- Possession of bombs or bomb-making materials;
- Physical assault or attempted assault, with or without weapons;
- Specific threats to inflict harm to self and/or a named individual (e.g., a threat to shoot a named individual);
- Physical, drug-related, or psychiatric disorders that may pose a potential harm to the physical or emotional well-being of the individual or others;
- Physical actions short of actual contact/injury, but which appear intended to provoke a physical response from the target individual(s) (e.g., moving closer aggressively, waving arms or fists, yelling in an aggressive or threatening manner).

**MODERATE Level of Concern:** Risk to UAH students, faculty, staff, and visitors appears to be moderate. Violent action is possible, but not probable. Threat is still not entirely realistic in nature. Analysis of threat suggests some

thought/action on how to go forward by person of concern, i.e. a specific time and location noted for actions. No clear indication of preparatory steps taken by person of concern. Person of concern may attempt to convey seriousness of situation. It includes, but is not limited to:

- General, specific, or implicit threats, whether or not made in a "joking" manner (e.g., "you better watch your back," "I'll get you," or "you'll be sorry"), including the use of any electronic means of communication;
- Stalking behavior;
- Vague statements regarding suicide or self-inflicted injury, violent thoughts, or violent intentions.

**LOW Level of Concern:** Behavior that, while it does not appear to pose a present threat of violence or self-harm or a significant risk of disruption, does provide the basis for a reasonable concern that a threat of violence or self-harm or significant risk of disruption may develop.

Threat is vague and indirect in nature. Information within threat is inconsistent, implausible, or lacks detail. Threat is not realistic in nature/presentation. Available information suggests person of concern is unlikely to act violently. Examples include, but are not limited to:

- Writing stories, poems, or essays, or producing images that express or otherwise indicate a potentially dangerous fascination or preoccupation with violence to self or to others;
- Displaying a radical change in personal behavior, academic or workplace performance, appearance, or conduct.

**No Identified Risk:** Behavior that, subsequent to reporting and BETA Team investigation, does not appear to pose a threat of violence or self-harm at this time, nor is significant disruption to the community expected. The BETA Team will close such cases after proper documentation for future reference and trend analysis purposes.

**Behavioral Evaluation and Threat Assessment (BETA) Team:** a multi-disciplinary assessment team comprised of representatives from Academic Affairs, Dean of Students Office, Housing and Residence Life, College of Nursing, Human Resources, Counseling Services, UAHPD, Office of Risk Management and Compliance, Title IX Office, Faculty Senate, and Staff Senate. The BETA Team reviews reports of alarming/concerning behavior and provides early intervention and support to individuals who present behavioral concerns.

**Faculty or Staff:** Any full or part-time employee of UAH, including, but not limited to, exempt or non-exempt staff, faculty, adjunct faculty, graduate research assistants, graduate teaching assistants, student workers, contract employees, and post-doctoral researchers/teachers/fellows (who have an employment relationship with UAH).

**Student:** Any individual enrolled at UAH in any of the recognized admission categories (undergraduate, graduate, etc.). An individual's status as a student shall be deemed to encompass all activities carried out in connection with their application for admission to the University.

**Visitor:** Individuals who are not currently enrolled as students or employed with UAH (e.g., visitors, retirees, volunteers, former students, former employees, invitees, independent contractors, trespassers, etc.).

**Workplace/Educational Setting:** Any location, either permanent or temporary, where students, faculty, or staff perform any work-related duty or are involved in educational activities and/or University sanctioned events. This includes, but is not limited to, campus buildings and the surrounding perimeters, including the parking lots, field locations, student housing, and alternate work locations.

## VII. ROLES AND RESPONSIBILITIES

### A. BETA Principles and Procedures

#### 1. Membership

The BETA Team consists of:

- Associate Provost (Chair, appointed by the Provost)
- Dean of Students
- Academic Dean (appointed by the Provost)
- Dean of the College of Nursing (or designee)
- Associate Vice President for Human Resources
- Director of Housing and Residence Life
- Title IX Coordinator (or designee)
- Director of Counseling Services
- Chief of Police
- Chief Risk and Compliance Officer (or designee)
- Faculty Senate Representative (nominated by the Faculty Senate for a three- year term)
- Staff Senate Representative (nominated by the Staff Senate for a three-year term)

A representative of the Office of Counsel will serve in an advisory capacity to the BETA Team. Additional ad-hoc members may be included as required by the specific circumstances of a particular situation.

#### 2. General Principles

The BETA Team will use a case-management based approach to respond to reports of faculty, staff, students, and visitors having difficulties and/or demonstrating concerning behaviors. The BETA

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Team should guide the process from internal assessment to recommending interventions with the objective of reducing the risk. This includes the development of a recommended plan for reintegration of the subject once initial actions are complete and the threat is eliminated.

The BETA Team will utilize available resources and additional members as appropriate to assist it in gathering information about a student, faculty, staff, or other university community member exhibiting behavioral concerns. The BETA Team may consult with other appropriate staff and/or medical/mental health experts in carrying out its assessment function. It is recognized that multi-disciplinary consultation is a critical part of the threat assessment protocol.

### 3. Process

**Report of Concern:** The BETA Team may receive written or oral reports about behaviors of concern from any member of the campus community. An oral report, when needed depending on the situation, should be followed by a written report. Situations involving a HIGH (EMERGENCY) Level of Concern should be immediately reported by the BETA Team to UAHPD. Persons reporting a MODERATE Level of Concern to the BETA Team should also be advised to report such matters directly to UAHPD.

**Inquiry/Investigation:** Upon receiving a report, the BETA Team will focus on determining whether or not the individual of concern poses, based on past and/or present behavior, a threat of violence or risk of disruption. The BETA Team may gather information and facts from all available sources. It will be granted limited access, as appropriate, to a student's record, including his/her disciplinary record, and/or to a faculty or staff's employment record. It may contact individuals with information about reported incidents or actions involving the individual of concern, as well as others (students, faculty, staff, local authorities, parents and family members, acquaintances, and other individuals who may know the individual or have pertinent knowledge). These inquiries may be made by the BETA Team acting as a convened group, a smaller group of designated members, or a designated BETA Team individual.

**Assessment and Development of Plan:** Based on information gathered by the BETA Team, a risk assessment shall be made of the subject individual's reported behavior and that behavior will be classified as HIGH (EMERGENCY) Level of Concern, MODERATE Level of Concern, LOW Level of Concern, or "no risk." The BETA Team shall then develop a plan as outlined in these guidelines and as appropriate for the risk classification that



has been assigned. The BETA Team will complete a risk assessment and develop a plan regardless of the outcome of any criminal proceedings initiated by law enforcement authorities and/or any disciplinary proceedings initiated by the University.

**Referral/Recommendation:** The BETA Team may make referrals or recommendations, as follows:

- Recommend actions to the appropriate University personnel including the Vice President of the pertinent administrative unit in each case. Recommended actions may include disciplinary procedures provided for by the Faculty, Staff, and/or Student Handbooks.
- Recommend that the subject faculty or staff member or student be referred for professional counseling and/or professional psychological assessment.
- Make recommendation(s) for the filing of criminal charges.
- Make recommendations for other actions as deemed appropriate.
- In case of a referral, appropriate federal and state laws regarding privacy will be followed.

**Conclusion:** Once the BETA Team has determined that the individual of concern does not pose or no longer poses a threat of violence or risk of significant disruption, the matter will be considered closed for the purposes of these guidelines. Involved parties may be informed when a situation is concluded. Reports regarding the disposition of the incident will be conveyed to the affected reporting individual(s), whenever possible and allowed by law.

- If follow up of a student is required or appropriate, the student of concern will be monitored by the Student Affairs and Academic Affairs offices.
- If follow up of a faculty or staff member of concern is required or appropriate, the employee will be monitored by his/her supervisor, Employee Assistance Program (EAP) personnel, Academic Affairs (for faculty), and/or Human Resources (for staff/researchers).

**Action by Other Officials:** The closing of a matter by the BETA Team is completely independent of, and will have no effect upon:

- For any individual of concern, the initiation or continuation of a law enforcement investigation into the individual's conduct by campus or local law enforcement authorities and/or the institution of criminal proceedings against such individual.

- For a student of concern, referral for professional counseling, referral for professional psychological assessment, the initiation of student disciplinary proceedings, or other appropriate action by Student Affairs or by Academic Affairs officials.
- For a faculty or staff member of concern, referral for professional counseling, referral for professional psychological assessment, the imposition of disciplinary sanctions or the initiation of disciplinary proceedings, or other appropriate action by the faculty or staff member's supervisor or other authorized officials.

It is anticipated that conduct violating University policy or rules or federal, local or state law will be addressed by institutional or civil/criminal proceedings initiated by those officials with the enforcement responsibility for such policy, rules, or law.

#### **4. Meetings**

The Chair of the BETA Team will call an emergency meeting as soon as is practicable upon receipt of a report of conduct that may fall into the HIGH (EMERGENCY) Level of Concern classification. In such situations, BETA membership duties should supersede all other responsibilities. The BETA Team should ordinarily meet within 72 hours of receipt of an initial report regarding conduct that appears to fall into the MEDIUM Level of Concern behavior classification, and it should meet within a reasonable time under all the circumstances with respect to conduct that appears to fall into the LOW Level of Concern behavior classification. As long as there are active cases being addressed under a Threat Management Plan or an Active Monitoring Plan, the BETA Team should meet regularly. A representative of the Office of Counsel shall attend all BETA Team meetings, emergency or otherwise, in an advisory capacity.

#### **5. Report**

A report of BETA activities will be submitted to the President and Provost at the end of every semester. This report will be in summary form, including numbers and actions only. Names of reporting persons and persons of concern shall never be included in any reports outside of BETA.

### **B. University Community Responsibilities**

Each member of the UAH community has a role and responsibility in helping promote a safe and secure environment for the University.

All persons are strongly encouraged to be aware of their surroundings and to be alert for behavior that may present a threat of violence or risk of disruption. Students, faculty, and staff should be familiar with these guidelines and with the methods for reporting actual or potential threats to the UAH community.

**See Something, Say Something:** Members of the UAH community (students, faculty, and staff) are encouraged to immediately report any situation that involves concerning behavior by a student, faculty, staff, or campus visitor; behavior that is or may be threatening to the health and safety of the individual or of others; or behavior that is or may be disruptive to the University's educational, research, and administrative activities. Any member of the University community who becomes aware of such a situation should report the matter to the BETA Team and/or UAHPD as appropriate to the observed behavior (see section I: A, B, C, D for information on how to report).

Students, faculty, and staff who in good faith make such reports shall not be subjected to retaliation or harassment by UAH or any of its officials. The making of a false or misleading report under these guidelines, with knowledge of or reckless indifference as to the falsity of the matters reported, may be considered misconduct under applicable conduct policies and may result in disciplinary action under UAH's student, faculty, and/or staff disciplinary procedures.

### **C. Security Planning for Potentially At-Risk Faculty, Staff, and Students**

Some faculty or staff can be at risk for violence/hostility because of the nature of their jobs. Other students, faculty, and staff can be at-risk because they are subject to violence, threats, or harassment from a current or former spouse or partner, or other third party.

UAHPD, Human Resources, the Dean of Students Office, Counseling Services, and other offices will work with at-risk faculty, staff, and students to develop safety plans that address the specific risks they face.

#### **1. Domestic Partner/Intimate Violence in the University Environment**

In an effort to promote a safer work environment, faculty and staff who are victims of domestic violence or who believe they may be the target or victim of such violence, should promptly notify their supervisor, an appropriate administrator, Human Resources, the BETA Team, or UAHPD. Faculty and staff may have additional services available through the Employee Assistance Program (EAP) and should contact the Human Resources Benefits Coordinator at 256-824-6545 for a listing of available EAP resources.

Likewise, to promote a safer educational setting, students who are victims of domestic violence or who believe they may be the target of such violence, are encouraged to promptly notify the Title IX Office; the Dean of Students, the BETA Team; or UAHPD. Confidential advocacy services are available to students through Counseling Services.

Students, faculty, and staff who have Protective Orders should provide copies to UAHPD so that this office can:

- Ensure appropriate law enforcement actions occur; and
- Assist in maintaining the safety of potential victims.

Examples of Protective Orders may include:

- Any order issued by a court that is intended to prevent one party from approaching another, often within a specified distance; or
- Any order issued by a court that is meant to protect a person from harm or harassment.

## **2. Pre-Employment Screening and Criminal Conviction Background Checks**

Human Resources administers the University's policies on pre-employment screening and background reference checks. Accordingly, Human Resources will advise hiring managers when potential problems are identified during this process.

## **VIII. REPORTING THREATS OF VIOLENCE**

### **A. Emergency Situations - HIGH (EMERGENCY) Level of Concern Behavior**

A situation possibly involving HIGH (EMERGENCY) Level of Concern behavior should be considered an emergency and should be immediately reported to UAHPD. UAHPD may be reached as follows:

- 6911 from a campus phone;
- 256-824-6911 from a cellular or off-campus phone;
- 911 from any phone (off-campus calls go to Madison County 9-1-1 Center).

Examples of HIGH (EMERGENCY) Level of Concern, emergency situations include, but are not limited to the following:

- Possession of unauthorized weapons (guns, knives, etc.) on campus;
- Possession of bombs or bomb-making materials;

- Physical assault or attempted assault, with or without weapons;
- Specific threats to inflict harm to self and/or a named individual (e.g., a threat to shoot a named individual);
- Physical, drug-related, or psychiatric disorders that may pose a potential harm to the physical or emotional well-being of the individual or others;
- Physical actions short of actual contact/injury, but which appear intended to provoke a physical response from the target individual(s) (e.g., moving closer aggressively, waving arms or fists, yelling in an aggressive or threatening manner).

**B. Non-Emergency Situations - MODERATE Level of Concern and LOW Level of Concern Behavior**

Any situation involving a threat of violence or a risk of disruption that lacks immediacy and is clearly not within the “HIGH (EMERGENCY) Level of Concern” classification should be reported pursuant to this section.

UAH’s Charger 360 (<https://www.uah.edu/Charger360>) provides a centralized way for UAH community members to report concerns and incidents or address observed difficulties that may impede a person’s success at UAH. Reporting a person of concern, where there does not appear to be an immediate risk, may be done as follows:

- Online through the Charger 360 tool: [https://cm.maxient.com/reportingform.php?UnivofAlabamaHuntsville&layout\\_id=6](https://cm.maxient.com/reportingform.php?UnivofAlabamaHuntsville&layout_id=6) (Reports may be submitted anonymously);
- Reports of concerning student behavior should be made to the Dean of Students by calling (256) 824-6700;
- Reports of concerning faculty member behavior should be made to Human Resources or the appropriate academic dean;
- Reports of concerning staff behavior should be made to the Human Resources office at (256) 824-2286, or to the employee’s supervisor.

Examples of conduct that may, depending on the circumstances, be considered appropriate for reporting as “non-emergency situations” include the following:

- A radical change in a person’s behavior, academic or workplace performance, appearance, or conduct;
- Aggressive or irrational behavior through words and/or actions;
- Severe depression, unhappiness, or irregular emotional behavior;
- Inability to control anger, confrontational or disturbing words or actions;
- Unusual overreaction to normal circumstances;

- A threat that lacks immediacy;
- Unusual nervousness, tension, or anxiety;
- Expression of suicidal thoughts, feelings, or acts;
- Any other action, word, or behavior that one may reasonably believe could lead to violence;
- Threatening statements, displays, photos, or other publications in electronic format or communication;
- Other examples as found in definitions above (see Section VI) for MODERATE Level of Concern and LOW Level of Concern.

## **IX. CONFIDENTIALITY**

Members of the BETA Team will make every reasonable effort to maintain the confidentiality of information disclosed to it in the course of its activities. The BETA Team will take reasonable steps to maintain the privacy of those who make a referral, if requested. If the circumstances do not allow privacy to be maintained, this will be discussed with the person making the referral. Information will be released on a need-to-know basis within the campus community and in accordance with local, state, and federal laws and UAH policies. UAH administrators will be sensitive and responsive to the potential for reprisal directed at students, faculty, or staff who report behavior within the scope of these guidelines. All records will be appropriately maintained or disposed of, depending on investigation outcomes. Responsibility for BETA records resides with the UAH Office of Counsel, which will maintain the records for a period of seven (7) years.

## **X. EDUCATION AND TRAINING**

### **A. University Community Training**

For this program to be effective, it is important for the UAH community to be aware of these guidelines and the BETA Team, the kinds of behaviors encompassed within these guidelines, the importance of reporting such behaviors, and how to contact members of the BETA Team with concerns or comments.

Information regarding the BETA Team, its purpose, and this Policy will be periodically incorporated into faculty and staff training workshops, new faculty, staff, and student orientation sessions, and regularly scheduled safety programs presented by UAHPD, Office of Risk Management and Compliance, Human Resources, and other campus health and safety organizations as appropriate. In addition, the BETA Team will provide an overview of the program, listing of Team members, and reporting guidance and instructions by way of the UAH web site and other modes of communication it deems appropriate.

Training for faculty, staff, and students should consist of, but is not limited to, the following:

- Informational Opportunities: Presentations, brochure distribution, emails to all students, faculty, and staff, student orientation sessions, faculty and staff orientation sessions, and web page development addressing the following:
  - What is the BETA Team and what is its mission;
  - What characteristics to look for in persons of concern;
  - How to submit a report to the BETA Team.
- Educational opportunities: Unit/departmental safety meetings, campus safety and security presentations, and student/organization safety presentations.
- Training Opportunities: In-depth training to assist members of the campus community in developing a skill set for assessing behavior that presents a threat of violence or a risk of disruption.

Department heads are encouraged to schedule training for supervisors and managers and to provide similar training for other staff as appropriate.

## **B. BETA Team Training and Education**

It is expected that the BETA Team members identified above (Section VII.A) will participate in threat assessment training and professional development opportunities, and will be familiar with laws, regulations, and UAH policies applicable to the scope of the BETA Team's mission.

## **C. A Note on the Family Educational Rights and Privacy Act (FERPA)**

FERPA protects student education records and information in them from disclosure, subject to certain recognized exceptions. One such exception allows a UAH official to make disclosure when an emergency exists and disclosure is necessary to protect the health or safety of the student or other individuals. The determination of whether or not "necessity" exists requires a consideration of the seriousness of the health or safety threat, the urgency of the matter, the need for the information, and the ability of the recipient of the information to deal with the emergency. The Chief of Police, the Dean of Students, or the Office of Counsel may provide assistance in making this determination.

In addition, it is important to understand that a faculty or staff member's observations of a student's behavior are not within the scope of FERPA. For example, if a faculty or staff

member sees a student exhibiting threatening behavior, the faculty or staff member may contact an appropriate University official for guidance on how to respond. In such a situation, an appropriate official might include members of the BETA Team, UAHPD, Counseling Services, the Dean of Students, a dean, a department chair, etc.

Disclosure of confidential student information to parents should only be made when consistent with FERPA and then only through the Dean of Students Office. The release of information about University students to the media should only be made by the University's Office of Marketing and Communications.

Review: The Office of Risk Management and Compliance, in consultation with the BETA Team, is responsible for reviewing and updating these guidelines every five (5) years, or more frequently if organizational or situational changes warrant.