

SUPERSEDES: NEW	SECTION: Academic and Student Affairs
POLICY AND PROCEDURE MANUAL	CODE NO. 507
MERCY COLLEGE OF OHIO, TOLEDO, OHIO	SUBJECT: CARE Team
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Signature: Dr. Susan Wajert, President	DATE OF NEXT REVIEW: 2025 January 1-31

Campus Assessment Response and Evaluation Team

PURPOSE:

The Campus Assessment Response and Evaluation (CARE) Team at Mercy College of Ohio (“College”) reinforces the College’s efforts to provide the students, faculty, staff, and visitors (“Community”) with a safe and secure environment to work, study, and live. As a subset of the Campus Violence Prevention Committee (CVPC), the CARE Team assists with prevention and intervention in incidents where members of the campus community are experiencing distress or engaging in harmful or disruptive behaviors, as well as supports individuals impacted by such incidents. The goal and mission of the CARE Team is to: gather appropriate information about students of concern; evaluate information about each case brought before the CARE Team; define and coordinate plan/response; implement a response to a perceived or real threat; and monitor the disposition of the case (Derived from the Higher Educational Mental Health Alliance (HEMHA) Project, Balancing Safety and Support on Campus: A Guide for Campus Teams-<http://hemha.org/wp-content/uploads/2019/01/campus-teams-balancing-safety-support-campus-jed-guide.pdf>). The CARE Team acts as a mechanism for improved coordination and communication across the campus and/or system and makes recommendations in accordance with existing college policies.

**Note: Nothing in this policy replaces faculty classroom management, disciplinary processes (either student conduct or Human Resources), campus emergency response protocols, or Campus Security responses to incidents.*

POLICY:

The CARE Team promotes the success, health, and safety of individuals within the community through engaging in proactive and collaborative approaches to identify, evaluate, and respond to risks associated with students, faculty, staff, and visitors exhibiting concerning behaviors. The role of the CARE Team is to: understand threats/concerns; evaluate legitimacy of concerns; identify motivations for violence; assess likelihood of physical harm to self and/or others; develop strategies for risk reduction; guide implementation of strategies, re-evaluate threat; and evaluate the needs of the community. The CARE Team strives to promote individual student, faculty, and staff well-being and success while prioritizing community safety.

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

Members of the CARE Team:

- Assistant Dean of Student Success (Co-Chair)
- Director of Career, Professional Development, & Retention (Co-Chair)
- Assistant Dean of Student Life
- Public Safety
- Youngstown location representative (through 2023 or until no longer applicable)
- Director of Accessibility & Testing Services
- Faculty member

Other individuals may be included as needed, such as, but not limited to: academic advisors, legal counsel, Director of Diversity & Inclusion, Human Resources, etc.

All members of the CARE Team will participate in training upon initial participation and at regular intervals thereafter in areas such as best practices for assessment teams, legal issues (including disability law protections), applicable information privacy laws, risk management, documentation, and any other topics to ensure that the team functions effectively.

Receiving Information

All members of the campus community are encouraged to report behaviors or incidents that are concerning to the CARE Team. Reports can be made through the Concern and Complaint form found on the Mercy College website: <https://mercycollege.edu/student-affairs/concern-complaint>.

Upon receiving a report, the CARE Team will follow up to evaluate and coordinate intervention(s), if needed. However, in the event of an emergency that requires immediate intervention, call 911 and/or Public Safety (419-251-4444).

Members of the campus community should report any behavior that is questionable, suspicious, or inappropriate, which may be presented through an individual's behavior or actions.

Examples of concerning behaviors could include, but are not limited to:

- Behaviors that regularly interfere with classroom environment or management
- Notable change in academic performance, including repeated unexcused absences
- Notable change in behavior or actions
- Impairment of thoughts, verbally or in writing
- Extreme disorganization or erratic performance
- Overly aggressive behaviors toward others
- Poor decision making and coping skills
- Continuing to pursue options that do not reasonably exist after being instructed to cease
- Inappropriate or unusual behavior that is significantly outside the boundaries or what is socially acceptable
- Low frustration tolerance
- Overreaction to circumstances
- Lack of resiliency
- Writing, comments, or artwork endorsing or memorializing unusual violence, morbidity, social isolation, despair, suicide or death; unusual interest in the above topics

- Indirect or direct threats in writings, verbalizations, or actions
- Lack of empathy and concern for others; inability to care
- Anger management problems
- Threats to others
- Appearance of being overly nervous, tense, or tearful
- Expression of suicidal thoughts or feelings of hopelessness.

It is the responsibility of the CARE Team to provide education to the campus community about its role and responsibility to report, concerning behaviors, what to report, where to report, how reports will be handled, and regular reminders of the process.

Assessment and Intervention

Upon receiving a report, the Co-Chairs of the CARE Team will ensure that all members of the CARE Team receive the information. The CARE Team will convene to evaluate the incident or concern through gathering appropriate and available information, evaluate the risk to the community, identify and implement the appropriate intervention(s), and conduct follow-up as appropriate.

Gathering Information

Upon receiving a report, the CARE Team will gather and review appropriate and available information needed to properly evaluate the report and plan proper intervention(s). Information may be gathered, for example, by talking with those who may have information/observations to share, reviewing available student records, medical information, law enforcement records, and/or reviewing publicly available information.

Level of Risk

Based on the information gathered, the CARE Team will utilize the following scale to determine the level of the risk that the incident/behavior poses to the campus community. Levels of Risk are generally based on the National Behavioral Intervention Team Association's (NaBITA) Threat Assessment Tool: <https://nabita.org/docs/2009NABITAwitepaper.pdf>

Mild Risk: Includes some disruptive or concerning behaviors, the individual may or may not show signs of distress, depressed, withdrawn, lack of trust, argumentative, or not interested in the perspective of others. At this risk level, there is no serious threat to the student of concern or the campus community. Any concerns can generally be resolved through consultation with the CARE Team and addressed between the parties involved.

Moderate/Elevated Risk: Behaviors that may indicate a moderate risk include repeated disruptive behavior, behaviors involving more than one person, challenging authority, destructive or vandalizing behaviors, alcohol or drug misuse/abuse, eating disorders, self-injurious behavior, vague threats, inconsistent threats, or suicidal thoughts.

Severe/Extreme Risk: May include seriously disruptive incident(s), repeated derogatory statements to others, erratic behavior, suicidal thoughts with plans or intent, aggression, or threatening others.

Possible Interventions

Possible CARE Team interventions may include, but are not limited to, the following:

- Referral to college and/or community resources
- Voluntary withdrawal from classes – based on discussions with a counselor or member of CARE Team, the student may choose to temporarily take time away from the College. Should this be the best option, the student will be directed to the Registrar to complete the steps for withdrawing.
- Referral to Dean of Students to address possible student conduct violations.
- Mandatory direct threat/safety assessment – the student may be required to participate in an individualized direct threat assessment for assessment to determine if the student may safely continue as a member of the College community and for assistance in gaining access to treatment, if needed. The assessment may result in an interim suspension and/or involuntary withdrawal. Conditions may be imposed as part of a suspension or withdrawal that the student must fulfill prior to readmission.
- Referral for criminal investigation and charges.

Direct Threat / Safety Assessment

In cases in which the College receives a report of concerning behavior that poses a risk to the health and safety of the College community and its members, the CARE Team will engage to determine the nature of the risk and any measures that can be taken to manage the risk. The CARE Team will make these determinations as the result of an individualized assessment.

The purpose of the assessment is to determine the level of risk the student poses to the health and safety of the College community and to inform decisions about the student's future participation in the College's programs. The CARE Team will not take or recommend adverse action against a student whose conduct is considered to pose a significant risk to the College community before conducting an individualized assessment.

The CARE Team will make an individualized assessment, based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence, to ascertain: the nature, duration, and severity of the risk; the probability that the potential injury will actually occur; and whether reasonable modifications of policies, practices or procedures or, where applicable, the provision of auxiliary aids and services, will mitigate the risk. The CARE Team undertakes this assessment to ensure compliance with the direct threat regulatory provisions and to ensure that students with disabilities are not subjected to adverse action on the basis of unfounded fear, prejudice and stereotypes.

The CARE Team may recommend to the Vice President of Student Affairs or other appropriate administrator that the College impose interim restrictions upon students up to and including an interim suspension. Interim restrictions may be imposed if the CARE Team believes that such interim restrictions are advisable to protect the College community or to ensure safety and maintenance of order of the College pending further assessment of the student.

Assessment

The CARE Team will notify the student of the direct threat inquiry in writing and will invite the student to provide documents or other information related to the team's assessment. If the student does not provide documents or other information, the CARE Team will proceed with the documents or information the CARE Team has available.

The CARE Team will convene and will consider what health and safety concerns the student's behavior raises and whether the risks associated with those concerns can be managed by modifications, support measures, or accommodations. The team may consider the imposition of a behavioral contract, if appropriate, that may include, among other things, consultations with health care professionals or restrictions on participation in College operations.

As part of the team's review, the student may be required to undergo an assessment with a health professional designated by the College within a specified period of time. The purpose of the assessment is to ascertain whether the student poses an immediate and direct threat to health and safety. At this assessment, the student will be asked to sign a release of information to allow the health professional conducting the assessment to communicate with the student's treating physician or mental health professional (if applicable) to allow for a comprehensive evaluation of whether the student poses such a direct threat. If the student chooses not to sign the release, the health professional will proceed with the assessment based on the information available to him/her. The student's parents/guardians may also be notified of the decision to require a health assessment.

If the team determines the student poses health or safety risk to the College community and that the risk cannot be mitigated by reasonable modifications of policies, practices or procedures or the provision of auxiliary aids and services, the CARE Team will make the necessary referrals for action regarding the student.

Appeal

A student may appeal a decision made by the CARE Team to the Vice President of Student Affairs within three business days of the decision. The Vice President will review the student's written appeal, review all available documents and information from the CARE Team, and render a decision in a timely manner. The CARE Team will not participate in the deliberation or decision regarding the student's appeal.

Return requirements

Following a determination that an individual poses a risk to the health and safety of the College community necessitating a voluntary or involuntary leave or withdrawal, the College may require as a precondition to a student's return that the student provide documentation that the student has taken steps to mitigate the previous behavior. The College may request records from the student and request permission to speak to a treating professional. The records and

information that will be requested and required are determined on a case-by-case basis depending on what information is necessary to determine whether the student is able to return and fulfill the fundamental requirements of the College's programs.

Follow-up

Upon implementation of interventions, the CARE Team will determine a plan for appropriate follow-up with each student. This may include checking with faculty and staff regarding behaviors. Additionally, students may be required to have periodic meetings with a counselor or a member of CARE Team.

Documentation and Recordkeeping

The CARE Team will track cases and document discussions and action. The documentation generated from the CARE Team will be kept in a secure electronic database system (Maxient) and maintained in accordance with the College's Record Retention Policy.

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