

SUPERSEDES: 3/14/2017	SECTION: Academic and Student Affairs
POLICY AND PROCEDURE MANUAL MERCY COLLEGE OF OHIO, TOLEDO, OHIO Signature on file Signature: Dr. Susan Wajert, President	CODE NO. 507
	SUBJECT: CARE Team
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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.

SCOPE:

As a subset of the Campus Violence Prevention Committee (CVPC), the CARE Team assists with prevention and intervention in incidents where members of the College 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 information about students of concern; assess 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 Camp: A Guide for Campus Teams- <https://www.jedfoundation.org/wp-content/uploads/2016/07/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: None of the information 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 at Mercy College promotes the success, health, and safety of individuals within the community through identifying and responding to individuals whose behaviors may be troubling with the intention to provide assistance and intervention to prevent incidents from occurring. 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 (as outlined by Deisinger & Randazzo, 2010; Best Practices in Campus Threat Assessment & Management).

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:

- Director of Student Life (Co-Chair)
- Director of Student Success Center (Co-Chair)
- Director of Accessibility Services
- Campus Safety representative
- Faculty representative
- Deputy Title IX Coordinator (Youngstown location)

*Other individuals may be included as needed, such as, but not limited to: academic advisors, legal counsel, Director of Diversity and Inclusion, Director of Career, Professional Development, and Retention, 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), risk management, documentation, and any other topics to ensure that the team functions effectively.

Members of the campus community should report any behavior that is questionable, suspicious, or inappropriate, which may be presented through an individual's appearance, spoken or written words, or specific actions. Examples of such "red flag" behaviors include:

- Behaviors that regularly interfere with classroom environment or management
- Notable change in academic performance, including repeated absences
- Notable change in behavior or appearance
- 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 strange behavior that is significantly outside the boundaries of socially acceptable behavior
- Low frustration tolerance
- Overreaction to circumstances
- Lack of resiliency
- Writing and comments endorsing violence; unusual interest in violence
- Indirect or direct threats in writings or verbalizations
- 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 “red flag” behaviors, what to report, where to report, how reports will be handled, and regular reminders of the process.

REFERENCING FORMS:

[Concern and Complaint form](#)

Board Approved: March 12, 2019

Board Committee Approved: February 26, 2019

Revised: February 2019 (*Modified focus of policy to response, added Director of Accessibility to membership of team, clarified several “red flag” behaviors*)

Board Approved: March 14, 2017

Board Committee Approved: February 28, 2017

Originated: February 2017

PROCEDURE 507

Receiving Information

All members of the campus community are encouraged to report behaviors or incidents that are concerning to the CARE Team by using the Concern and Complaint form, available online (<https://mercycollege.edu/student-affairs/concern-complaint>). Upon receiving a report, the CARE Team will follow up to assess and intervene, if needed. However, in the event of an emergency that requires immediate intervention, call 911. Non-emergency law enforcement reports can be made to Mercy Public Safety in Toledo (419-251-4444) or Mercy Health Youngstown Police (330-480-3288).

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 meet to assess the incident through gathering information, evaluating the risk to the community, identifying and implementing the appropriate intervention(s), and determining follow-up as appropriate.

Gathering Information

The CARE Team may gather information from several sources, such as:

- Review of student's academic and disciplinary history
- Review of available medical information, including diagnoses and treatment history
- Local law enforcement or legal/criminal background check
- Previous colleges, if student has transferred
- Interviews with all parties involved, including targets of inappropriate/concerning behaviors
- Interview with the person alleged to have displayed inappropriate/concerning behavior
- Assessment by counselor/mental health professional
- Online search of the student's name, and the name(s) of anyone the student may have threatened, harassed, pursued, or scared

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 based on the National Behavioral Intervention Team Association's (NaBITA) Threat Assessment Tool: <https://nabita.org/wordpress/wp-content/uploads/2014/04/2014-NaBITA-Threat-Assessment-Tool.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

- 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, according to applicable College leave policies and procedures.
- Referral to disciplinary process
- Removal from campus housing
- Mandatory direct threat/safety assessment – the student may be required to participate in an individualized direct threat 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.
- Criminal 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/Dean of Students 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 contact, 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 follow-up monitoring of the student. This may include checking with faculty and staff regarding behaviors. Additionally, the student 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 or kept in paper form in a locked file cabinet in the VPSA/Dean of Students' office.