



NORTHWESTERN
UNIVERSITY

Responsible University Official: Associate
Vice President for Public Safety & Chief of
Police
Responsible Office: University Police
Origination Date: June 5, 2009

NORTHWESTERN UNIVERSITY BEHAVIORAL CONSULTATION TEAM

Policy Statement

Northwestern University is committed to the safety and security of its students, faculty, staff, and visitors. To that end, this policy specifically addresses the University's implementation of a threat assessment team dedicated to the prevention, reduction, and management of violence.

Reason for Policy/Purpose

Pursuant to the Illinois Campus Security Enhancement Act of 2008, all institutions of higher education in Illinois are required to develop and implement campus threat assessment teams. This policy supports the comprehensive violence prevention strategies of Northwestern University by formalizing the University's threat assessment process. Northwestern's Behavioral Consultation Team conducts threat assessments, addresses aberrant, dangerous, or threatening behavior that might impact the safety or well-being of the campus community and provides guidance and best practices for preventing violence and providing supportive services.

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Who Approved This Policy

Executive Vice President and Vice President
for Student Affairs

Who Needs to Know This Policy

All members of the Northwestern University community.

Website Address for this Policy

<http://www.northwestern.edu/up/docs/NUBCT060509.pdf>

Contacts

If you have any questions on the policy or procedure for the Northwestern University Behavioral Consultation Team, you may:

Call Director of Threat Assessment, Michelle Hoy-Watkins, PsyD, at 847-467-5375 or Assistant Vice President & Deputy Chief of Police, Gloria Graham at 847-467-5376.

Send an e-mail to mhoy@northwestern.edu or gloria.graham@northwestern.edu.

1. Visit the Behavioral Consultation Team webpage at <http://www.northwestern.edu/up/crime/threat-assessment.html>

Definitions

Behavioral Threat Assessment – The identification, review, and monitoring of any Northwestern University student, staff, faculty or non-affiliate who has raised concerns related to threats of harm to self or others, and other concerning behaviors that significantly disrupt the campus learning or work environment (Deisinger, G., Randazzo, M., O’Neill, D., Savage, J., 2008).

"Credible threat of violence" means a statement or course of conduct that causes a reasonable person to fear for the person's safety at his or her workplace or for the safety of others at his or her workplace. (820 ILCS 275/) Workplace Violence Prevention Act

Behavioral Consultation Team (BCT) – a Crime Prevention resource of Northwestern University’s Police Department. The BCT is a multidisciplinary team comprised of representation from NU Police, Dean of Students Office, Human Resources, Counseling and Psychological Services (CAPS), Title IX office that discusses any individual who have raised a concern about violence potential or who pose a significant disruption to the campus community (Deisinger, G., Randazzo, M., O’Neill, D., Savage, J., 2008).

Policy/Procedures

Northwestern University does not tolerate acts or threats of violence committed by or against employees, faculty, students, visitors, or other third parties on University owned, controlled, or leased properties or in connection with University events or programs. All useful management strategies will be employed to identify and prevent incidents of campus violence in order to reduce the effects of violence on victims and to address and respond to those who threaten or perpetrate violence. University employees, faculty, and students are strongly encouraged to report violent, potentially violent, and threatening behavior to University officials and will not be subjected to any acts of retaliation for reporting concerns. The University will use available resources such as the University Police, Employees Assistance Program, Human Resources, the Division of Student Affairs/Dean of Students Office, and applicable programs and policies in responding to alleged acts/threats of violence.

Mission

The Northwestern University Behavioral Consultation Team (hereinafter NUBCT) supports the comprehensive violence prevention strategies of Northwestern University by:

- serving as the central point of contact for receiving community concerns regarding persons who may be at risk of harming themselves or others;
- conducting multi-disciplinary, collaborative, coordinated and objective assessments of faculty, staff and students or other third parties whose behavior may reasonably present a threat to themselves or others in the university community;
- developing and implementing appropriate interventions and assistance with such individuals;
- recommending actions to appropriate university officials to resolve potential threats;
- monitoring the effectiveness of a threat management plan; and
- collaborating with the Violence Prevention Committee in outreach efforts aimed to provide guidance to faculty, staff and students about how to recognize, address and report threatening behavior.

Guiding Principles

- The safety of individuals and the Northwestern community is the primary focus of the team and a shared concern of all members of the community.
- The team is not a substitute for emergency response to an active or imminent threat to the safety of the university community.
- Coordination, collaboration, and effective information sharing is critical to team performance.
- A fact-based, analytical approach will guide the decision making process of the team.

- The team will establish or utilize existing collaborative relationships with local, state, and federal law enforcement and other local and institutional resources as necessary in order to expedite assessment and intervention with individuals whose behaviors may present a threat.
- The team will treat all persons fairly, with dignity and respect.
- The team will address and manage impact to individuals, groups and the community.

Team Members

The NUBCT is a multi-disciplinary team composed of individuals from various departments. See **Diagram 1** for an overview of team membership and see **Appendix A** for a listing of the core members of the team, team consultants, and ad hoc members who may be called upon by the Team in specific situations as well as a description of each of their roles.

Team Process

When the NU Behavioral Consultation Team first learns about a student, faculty member, staff member, or third party who has engaged in violent, threatening or potentially threatening behaviors or whose conduct or actions raise concerns about their potential for violence or suicide (hereinafter, a “person-of-concern”), the team will follow a general process and sequence of steps depicted in **Diagram 2**.

Identifying Persons-of-Concern

The following example behaviors may indicate that a person may be distressed and concerning to the campus community (the behaviors listed below are not meant to be an exhaustive list):

- A student, faculty, staff member, or other third party exhibits behavior that can reasonably be interpreted as threatening.
- A student, faculty, staff member, or other third party makes an explicit threat of violence to any member of the NU community.
- A student, faculty, staff member, or other third party exhibits highly disruptive behavior, including, hostile, aggressive, bullying, intimidating, and/or violent behaviors.
- A student, faculty, staff member, or other third party expresses concern about their personal safety.
- A student, faculty, staff member, or other third party is cited, arrested or investigated for a violent or threatening offense.
- A student, faculty, staff member, or other third party pursues options that do not reasonably exist and continues to do so after being instructed to cease (*i.e.*, a student continues to pursue a grading complaint after being informed all administrative procedures have been exhausted, or a staff member persists in pursuing a reversal of a sanction after exhausting the established appeal process).

If you become aware of or are concerned that anyone may be a person-of-concern, you should contact Director of Threat Assessment Michelle Hoy-Watkins, PsyD, at 847-467-5375 or ormhoy@northwestern.edu or any of the following Core Members of the NUBCT:

- Assistant Vice President (AVP) & Deputy Chief of Police Gloria Graham at 847-467-5376
- Executive Director of Counseling & Psychological Services (CAPS) John Dunkle, PhD, at 847-491-2151 or j-dunkle@northwestern.edu
- Assistant Vice President & Dean of Students Todd Adams at 847-467-2529 or todd.adams@northwestern.edu
- Assistant Dean & Director of Student Conduct Tara Sullivan, PhD, at 847-467-5078 or tara.sullivan@northwestern.edu
- Senior Associate Dean of Students Mona Dugo at 847-491-8430 or mona.dugo@northwestern.edu
- Associate Vice President of Human Resources Dana Bradley at 847-467-5629 or dana.bradley@northwestern.edu
- Human Resources Consultant Tracy Walker, 847-491-7411 or tracy.walker@northwestern.edu
- Associate Provost for Faculty Lindsay Chase-Lansdale, PhD, at 847-491-8543 or lcl@northwestern.edu
- Technical Services Assistant Amanda Smaha at 847-467-5379 or Amanda.smaha@northwestern.edu

Inquiry Phase (Team assembled)

When a person-of-concern has been identified, the team conducts a fact-based threat assessment inquiry, guided by the list of Fact Based Considerations in **Appendix B** of this document. The NU Behavioral Consultation Team members will determine whether a person-of-concern is on a path toward or away from harmful or violent behavior, the level of risk that currently exists for harm or violent behavior (*see Appendix C*), and/or if the person does not pose a threat of harm or violence, the need for managed assistance or intervention.

In determining whether a person-of-concern presents a direct threat, the NU Behavioral Consultation Team will make an individualized and objective assessment of the individual's ability to safely remain in the University community, based on the best available objective evidence (*see Appendix B*) or a reasonable medical judgment relying on the most current medical knowledge. To the extent possible, the assessment will determine the nature, duration, and severity of the threat, the probability that the potentially threatening injury will actually occur, and whether reasonable modifications of policies, practices, or procedures will sufficiently mitigate the threat. An individual's observed conduct, actions, and statements will be considered, not mere knowledge or belief that the individual has a disability. An individual with a disability will not be subjected to an adverse action based on unfounded fears, prejudice, and stereotypes.

Developing/Maintaining Management and Assistance Plans

The NUBCT will determine the most appropriate intervention and/or referral plan for the person-of-concern, including plans for monitoring and follow-up. Management plans are interventions for persons-of-concern who the team determines pose a threat. Assistance plans

are interventions designed for persons-of-concern who are believed not to pose a threat but may need to be connected to appropriate services. The team may access a range of support services for students, faculty and staff that includes mental health services, crisis management and comprehensive services for victims, whether provided on campus or by accessing community resources.

Review, Update, & Training

The NUBCT will conduct an annual review and update of policy and procedures. Any proposed amendments may be made with the approval of the Associate Vice President and Chief of Police and the Vice President for Student Affairs, who, in turn, will determine any other approval that may be needed.

In order to continually improve team functioning, the NUBCT will participate in tabletop exercises and threat assessment training sessions as often as practicable and at least once annually.

Authority

All members of the University community (faculty, staff, and students) shall cooperate with requests for information from the NUBCT relative to successfully monitoring any person-of-concern.

In addition to its information gathering and assessment functions, the NUBCT is an advisory body that may make recommendations to an applicable University school or department to take specific actions regarding a person-of-concern. If the school or department chooses not to follow the NUBCT's recommendation in cases where there is an immediate and/or significant concern for safety, the NUBCT may further communicate its recommendation to University officials up to and including the University President, as necessary.

Retaliation

The University prohibits retaliation against anyone for registering a concern with the NUBCT, assisting another in registering a concern, or participating in an NUBCT investigation. Anyone experiencing any conduct that he or she believes to be retaliatory should immediately report it to the Dean of Students, Vice President for Student Affairs, Office of Human Resources or Office of the Provost. The University's Policy on Non-Retaliation is available at: <http://www.northwestern.edu/provost/policies/statements/non-retaliation.html>.

Confidentiality

Reports of threatening behavior made to the NUBCT will be handled as discreetly as possible, with facts made available only to those who need to know to investigate and properly intervene in the matter. Please note, however, that disclosure of threatening behavior may be necessary to protect the health and safety of the Northwestern community. Information may be provided to emergency response personnel, police, parents and family members, third party forensic assessment organizations, or in extreme circumstances, the entire Northwestern community,

among others.

Forms/Instructions

N/A

Appendices

Appendix A – Team Members and Team Members Roles and Responsibilities

Appendix B – Threat Assessment Inquiry: Fact-Based Considerations

Appendix C – Priority Levels for Persons-of-Concern

**Diagram 1: Northwestern University Behavioral Consultation Team
Core Members**

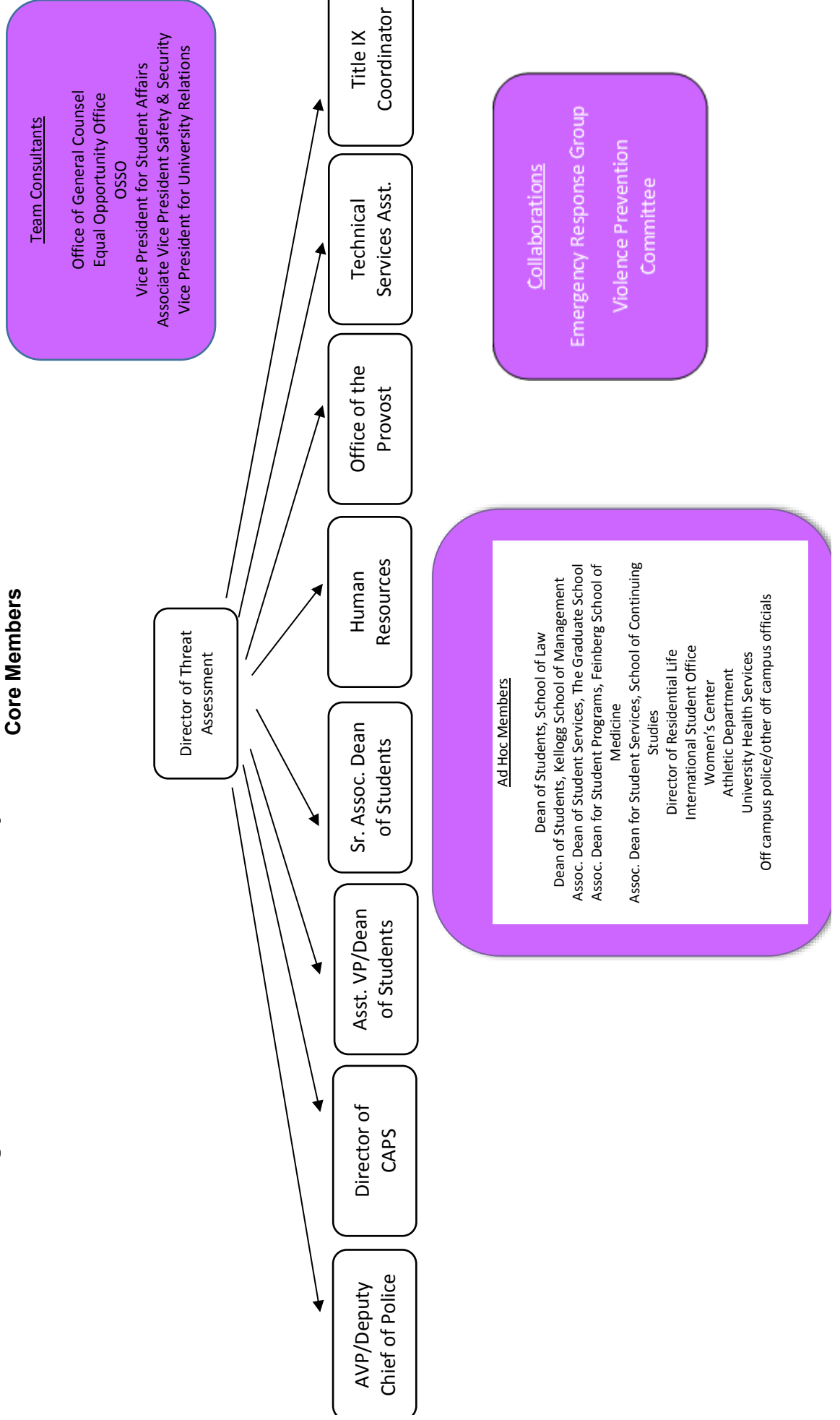
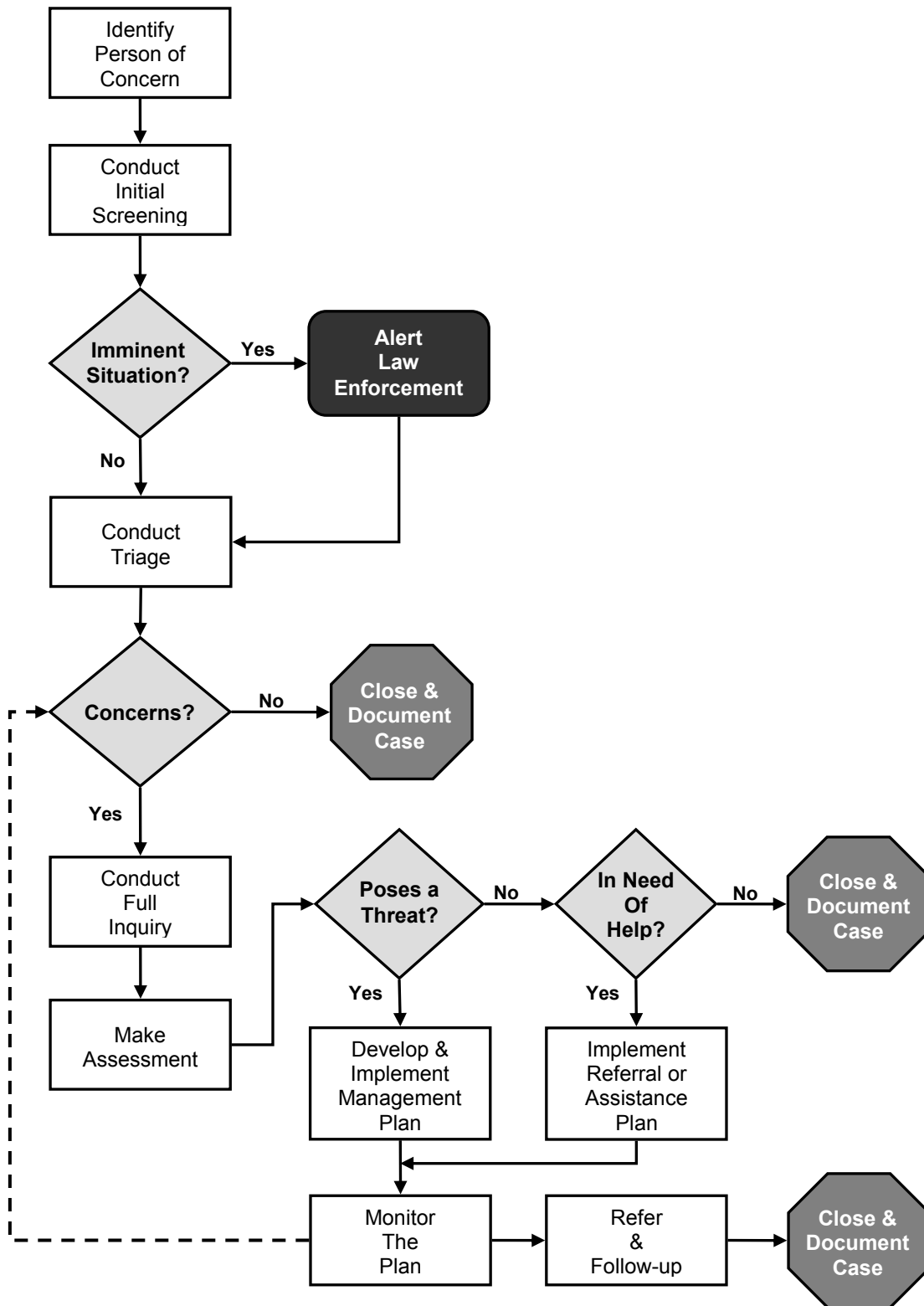


Diagram 2: NU Behavioral Consultation Team Management Flowchart*



Source: Deisinger, G. & Randazzo, et. al. (2008)

Appendix A

Team Members

The NUBCT is a multi-disciplinary team composed of individuals from various departments. The sections below outline the core members of the team, team consultants, and ad hoc members who may be called upon by the Team in specific situations. See Diagram 1 for an overview of team membership.

- **Core Members:** Core members are encouraged to attend all meetings when possible.
 - ⇒ Director of Threat Assessment: **Chair**
 - ⇒ Assistant Vice President & Deputy Chief of Police
 - ⇒ Executive Director of Counseling & Psychological Services (CAPS) (or designate)
 - ⇒ Assistant Vice President & Dean of Students (DOS) for Evanston Campus
 - ⇒ Assistant Dean of Students & Director of Student Conduct (formerly Judicial Affairs)
 - ⇒ Senior Associate Dean of Students
 - ⇒ Associate Vice President for Human Resources (or designate)
 - ⇒ Academic Affairs/Provost representative
 - ⇒ Technical Services Assistant
 - ⇒ Title IX Coordinator

- **Team Consultants:** Team consultants are available to advise the team on various issues but generally do not attend regular meetings of the NU Behavioral Consultation Team, with the exception of Office of General Counsel (OGC) representative who should attend all meetings.
 - ⇒ OGC representative
 - ⇒ Office of Equal Opportunity and Access representative
 - ⇒ Office of Services for Students with Disabilities (SSD) representative
 - ⇒ Director of Risk Management
 - ⇒ Vice President of Student Affairs
 - ⇒ Vice President for University Relations
 - ⇒ Senior Vice President for Business and Finance

- **Ad Hoc Members:** Ad Hoc members may be called upon by the Team for situations involving individuals who may be of concern in their specific areas. This is not an exhaustive list, but rather, a representation of some of the major constituencies.
 - ⇒ Dean of Students, School of Law
 - ⇒ Dean of Students, Kellogg School of Management
 - ⇒ Associate Dean of Student Services, The Graduate School
 - ⇒ Associate Dean for Student Programs and Career Services, Feinberg School of Medicine

- ⇒ Associate Dean for Student Services, School of Continuing Studies
- ⇒ Director of University Residential Life
- ⇒ International Student Office representative
- ⇒ Study Abroad Office representative
- ⇒ Women’s Center representative
- ⇒ Athletic Department representative
- ⇒ University Health Services representative
- ⇒ Off-campus law enforcement and other off-campus officials
- ⇒ Other specific school representative, as appropriate
- ⇒ Other campus department representative, as appropriate

Team Member Roles/Responsibilities

Core Members

- **Director of Threat Assessment (DOTA):** The Director of Threat Assessment serves as the team Chair. The Chair also articulates the team consensus for assessment and intervention in specific situations. The DOTA provides leadership and coordinates case management of Northwestern University's Behavioral Consultation Team related to assessing threats to the personal safety of students or other community members. The DOTA oversees caseloads of ongoing investigations and assists in the formulation, determination, and implementation of threat response plans. The DOTA will develop and coordinate training in issues related to threat assessment and provide outreach and resources to the campus community.
- **Assistant Vice President & Deputy Chief of Police:** The AVP /Deputy Chief of Police conducts investigations (including background checks), coordinates efforts with both internal and external law enforcement agencies, helps to initiate orders of protection, coordinates emergency services, and acts as a liaison for all law enforcement actions, including criminal investigations, as necessary.
- **Executive Director of CAPS (or designate):** CAPS provides consultation regarding mental health issues and how they relate to the specific case. CAPS also coordinates with outside mental health agencies for possible referrals/consultations with those services. In most cases, the CAPS representative will be the Executive Director of CAPS, unless there is a conflict of interest situation with the specific individual being discussed. The CAPS representative should not be in a treatment relationship with the person who is a focus of the NUBCT, so as to avoid conflict of interest and confidentiality issues.
- **Assistant Vice President & Dean of Students (DOS) for Evanston Campus:** The DOS serves as a central point of contact regarding students of concern and may provide information from a variety of sources, including faculty, staff, students, community members, and parents or family members. The DOS provides any background information regarding student medical withdrawals that may be relevant for team deliberations. The DOS also may be the staff member designated by the team to be the first contact with the student, may serve as a liaison to parents and families, and makes recommendations about calling in ad hoc team members from specific schools as needed.
- **Assistant Dean & Director of Student Conduct & (formerly Judicial Affairs)**

(DSC): The DSC interprets the Student Code of Conduct and other student-related policies. The DSC may also provide student conduct background that may be relevant for team deliberations (e.g., previous disciplinary or conduct issues).

- **Technical Services Assistant:** The technical services assistant takes notes of NUBCT meetings, prepares meeting minutes, and serves as the custodian of team records.
- **Senior Associate Dean of Students:** The Senior Associate Dean of Students provides support and assistance to the DOS and DSC in all of their team responsibilities and may perform any of the duties identified for those positions.
- **Office of Human Resources (HR) Representative:** The HR representative may provide employee information and records to the NUBCT when there is a staff member who is being assessed by the team. The HR representative assists in interpreting personnel policies, contractual issues, and keeps the NUBCT informed of any impending personnel issues or employment terminations.
- **Academic Affairs/Provost Office Representative:** This team member provides information and records to the NUBCT when there is a faculty member who is being assessed by the team. The Provost Office representative assists the team in interpreting academic policies and procedures and makes recommendations about calling in ad hoc team members from specific schools, when needed.
- **Title IX Representative:** This representative will provide relevant background on cases related to sex discrimination, sexual harassment, or sexual violence that are needed for team deliberations. The Title IX representative will assist in interpreting policies as it relates to Title IX NU policies and applicable laws.

Team Consultants

- **OGC Representative:** The OGC representative provides consultation to the NUBCT regarding compliance with relevant laws and policies.
- **Equal Opportunity and Access representative:** The NUBCT may consult this representative, in cases involving faculty or staff, regarding compliance with Title VII, the Age Discrimination in Employment Act (ADEA), the Americans with Disabilities Act (ADA), and other laws, policies, and regulations prohibiting discrimination and retaliation.
- **SSD representative:** The SSD representative may provide consultation to the NUBCT regarding compliance issues with the Americans with Disabilities Act (ADA). The representative may also have relevant information/records about a student who has identified with the University as having a disability as defined by the ADA.
- **Director of Risk Management:** The Director of Risk Management may be consulted by the NUBCT to identify risk exposure and relevant University risk management mitigation strategies.
- **Vice President of Student Affairs (VPSA):** The VPSA, as one of the leaders of the Violence Prevention Committee, consults with the NUBCT Chair to ensure that the work of the team takes into consideration the overall violence prevention plan. The VPSA also makes student-related intervention decisions as necessary.
- **Vice President for University Relations (VPUR):** The VPUR maintains public information in major cases. The NUBCT Chair serves as the liaison to the VPUR to ensure that appropriate information is forwarded. The VPUR also relates information to the public, media, and University community when appropriate.

- **Senior Vice President of Business and Finance (VPBF):** The VPBF consults the NUBCT regarding cases implicating significant University financial resources and/or risk. The VPBF also makes staff-related intervention decisions as necessary.

Ad Hoc Members

- **Ad Hoc Representatives:** Other members of the Northwestern community may be called upon to provide information/consultation to the NUBCT, as needed.

Appendix B

Threat Assessment Inquiry: Fact-Based Considerations

The following non-exclusive fact-based considerations guide threat assessment inquiries of persons of concern for harmful or violent behavior. These considerations will help Behavioral Consultation Team members determine whether a person of concern is on the path toward or away from harmful or violent behavior, the level of risk that currently exists for harm or violent behavior, or if the person does not pose a threat of harm or violence, the need for managed assistance or intervention.

The following guiding principles of a fact-based threat assessment approach should be considered by team members when conducting an inquiry¹:

- Targeted violence is neither random nor spontaneous. Target violence, rather, is seen as a result of an understandable, and often discernible, pattern of thinking and behavior.
- There is no profile or single “type” of a perpetrator of targeted violence. The threat assessment process is about behaviors, not profiling.
- Unusual or aberrant behaviors or interests are not necessarily the hallmarks of a person destined to become violent.
- There is a distinction between making a threat (expressing intent to harm) and posing a threat (engaging in behaviors that further a plan to harm).
- Many persons who pose a serious risk of harm will not issue direct threats prior to an attack.

Potential Imminent Warning Signs and Violence-Related Behaviors

1. Threat is present.
2. Seriously disruptive or intimidating behavior.
3. Suicide threats, gestures or statements.
4. Detailed plausible threats of violence (time, place, target, method).
5. Indications the person has undertaken planning or rehearsals to carry out an act of harm or violence.
6. Acts of rage, harm, violence, or destruction of property.
7. Recent weapon-seeking behavior linked to ideas or interests in harm or violence.
8. Communications indicating the person has a worrisome interest in violence or is considering violence.
9. Surveillance of sites or persons linked to ideas or interests in harm or violence.

Potential Early Warning Signs and Risk Factors

1. Disruptive, intimidating or concerning behavior.
2. Social withdrawal or isolation.
3. Threat is made, but is vague or indirect. Threat lacks realism.
4. Desire to kill, die or be killed
5. Does the person see violence as the acceptable, desirable, or only way to solve problems?
6. Excessive feelings of rejection.
7. Excessive feelings of victimization.
8. Expressions of harm or violence.
9. Uncontrolled anger.
10. Prejudicial attitudes.
11. History of discipline problems or poor work/academic performance.
12. Drug or alcohol abuse.
13. Obsession with perceived injustices.
14. Obsession with violent acts or weapons.
15. Excessive feelings of desperation or despair.

¹ Randazzo, et al. Threat Assessment in Schools: Empirical Support and Comparison With Other Approaches
U.S. Secret Service. Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates

Precipitating Events, Pre-Disposing Factors and Current Life Information

1. Relationship difficulties or conflict.
2. Death, loss or other traumatic event.
3. Recent failure or loss of status.
4. Inappropriate desire for attention, recognition, or notoriety.
5. Obsessive pursuit, stalking, monitoring, or undesired communications with others.
6. Are other people concerned about the person's potential for harm or violence?
7. Present stability of living and home situations.
8. Current grievances or grudges.
9. Known difficulty dealing with a stressful event.
10. Downward progression in social, academic, behavioral, employment, or psychological functioning.
11. School or other agency involvement.
 - a. Law enforcement, court, probation services
 - b. Discipline
 - c. Mental health
 - d. Social Service

Motive, Intent & Resolve

1. What motivated the person to make the statements or take the actions that caused him or her to come to attention?
2. Mental and emotional state at time the threat was made.
3. Does the circumstance or situation that led to these statements or actions still exist?
4. Does the person have a major grievance or grudge? Against whom?
5. What efforts have been made to resolve the problem and what has been the result? Does the person feel that any part of the problem is resolved or see any alternatives?
6. Where does the person exist along the pathway to harm or violence?
 - a. What thresholds have been crossed (has the person violated agreements or court orders, made a will, given away personal items, or expressed willingness to die or be incarcerated)?
 - b. How fast are they moving towards harm or violence?

Capability

1. Does the person of concern have the capacity to carry out an act of harm or violence?
2. How organized and practical are the person's plans and threats?
3. What circumstances might affect the likelihood of harm or violence?

Stabilizing Factors

1. Family support/involvement.
2. Mental health or social service support.
3. Other support or intervention.
4. Relationship with someone that the person of concern can confide in.
5. Others who know the person of concern and can discourage violence.

Appendix C

Priority Levels for Persons-of-Concern

Priority 1 (Imminent Risk)

The person/situation appears to pose a clear and immediate threat of serious violence toward self or others and requires containment. The Team should immediately notify law enforcement to pursue containment options, and/or take actions to protect identified target(s). Once such emergency actions have been taken, the Team may continue monitoring situation.

Priority 2 (High Risk)

The person/situation appears to pose a threat of self-harm or physical violence, usually to an identifiable target, but currently lacks immediacy and/or a specific plan – or a specific plan of violence does exist but currently lacks a specific target.

Priority 3 (Moderate Risk)

The person/situation does not appear to pose a threat of violence to self or others at this time, but does exhibit behaviors/circumstances that are likely to be disruptive to the community.

Priority 4 (Low Risk)

The person/situation does not appear to pose a threat of violence or self-harm at this time, nor is there evidence of significant disruption to the community.

Priority 5 (No Identified Risk)

The person/situation does not appear to pose a threat of violence or self-harm at this time, nor is there evidence of significant disruption to the community. The Team can close the case without a management or monitoring plan, following appropriate documentation.

Related Information

N/A

History/Revision Dates

Origination Date: June 5, 2009

Last Amended Date: March 31, 2016

Next Review Date: August 31, 2016