



PRESIDENTIAL INTERNAL REVIEW

Working Group Report on the Interface between Virginia Tech
Counseling Services, Academic Affairs, Judicial Affairs and Legal
Systems

Submitted to President Charles Steger

August 17, 2007

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Executive Summary

In response to the tragic events of April 16, 2007, Virginia Tech President Charles Steger requested an internal review conducted by a working group to examine the interface between the university's student counseling services, academic affairs, judicial affairs and the legal system. The Working Group was charged with examining "...the existing systems and the interface between them; determining what constraints legal and otherwise hamper effective interaction among these areas." The Group consisted of 17 key personnel from the units in the overall system and focused its attention on examining Virginia Tech's capacity and efficacy in identifying, responding to and supporting at-risk students. The Group conducted its work through five methods: (1) full committee discussions (2) one-on-one interviews between the Chair of the Working Group and individual personnel (3) participation in a symposium with six national experts (4) analysis and review of relevant educational policies and procedures at Virginia Tech and other educational institutions, and (5) analysis and review of relevant state and federal documents.

Recommendations

The Working Group respectfully submits seven primary recommendations for strengthening Virginia Tech's system for dealing with at-risk students.

- Refining the Care Team. The Care Team is a central structure in identifying and responding to students at risk as it incorporates members from all key student affairs units and other units of the university when appropriate. It is recommended that it be a more formally recognized and visible structure in the university system and that its Protocol be updated to reflect impending changes. Effectiveness of the operation of the Care Team could be enhanced by adding a Virginia Tech law enforcement officer and the director for The Office of Services for Students with Disabilities as permanent team members and connecting academic affairs personnel more directly to the deliberations. In addition, steps need to be taken to ensure that at least one person on the Team has a comprehensive picture of the cases being considered and is authorized if there is need to share information with others internally and externally when appropriate.
- Creating a Threat Assessment Team. A new structure is needed to complement the work of the Care Team for students who may pose a threat to others. It is recommended that a structure, a team, be created that has specific responsibility for threat assessment to strengthen the overall system for the consideration of the most complex cases. The Team would be charged with conducting a comprehensive fact-based description of a distressed student and empowered with the authority to act in a timely manner, consistent with university policy and applicable law, if necessary,
- Expanding Case Management Capacity. Increased capacity for follow up on students who have been considered by the Care Team or seen by Cook Counseling Center will strengthen services to students in need. It is recommended that two additional case managers be added to the staffs of the Dean of Students Office and Cook Counseling Center to improve follow up services to students, as well as facilitate the information flow regarding the case across units. The case manager will maintain a comprehensive picture of the student and focus on the implementation

of interventions, coordination of services and the monitoring of the effectiveness of the interventions.

- Improving Communication in the System. Effective communication among units regarding at-risk students is essential. There are a number of recommendations intended to enhance communication in the system including conducting on-going training for personnel on the application of the Family Educational Privacy Act (FERPA) in the discussion of cases, clarifying public statements in university policy on how FERPA is applied, establishing a central university contact who has a comprehensive picture of distressed students who have been assessed by the system, clarifying policies for communicating with external agencies regarding acutely distressed students, and implementing a new policy for emergency notification information for students.
- Expanding Training of Administrators, Faculty, and Staff in Violence Prevention. The effort to raise the level of awareness regarding the considerable resources that are available to members of the university community in seeking assistance with distressed students is vital. It is recommended that additional training programs be directed to administrators, especially newly appointed ones, as they are key participants for bringing others in their unit up-to-date information related to campus safety. It is further recommended that new strategies be developed to raise the awareness of faculty and staff regarding the availability of resources for dealing with at-risk students and employees.
- Extending the University-wide Violence Prevention Policy. A structure is needed that will help integrate the numerous university-wide efforts to enhance campus safety. It is recommended that a university level committee be formed that ensures that programs are in place to support the Campus and Workplace Violence Prevention Policy. The Committee would bring oversight from all precincts of the university, including student affairs, academic affairs, human resources, facilities and administrative services with regard to policy, operations and resources that are intended to create a coherent approach to ensuring a safe campus environment.
- Building Community to Promote Individual and Community Well Being. A strong, vibrant and supportive community is essential in ensuring a safe campus environment. An environment that promotes civility, works toward the acceptance of others' differences, strives to include rather than exclude and provides assistance to those in need is fundamental to a safe campus. Virginia Tech has instituted a number of efforts to provide such an environment. It is recommended that a more systematic approach be instituted that specifies campus-well being as a goal and ensures that the various efforts are connected. The coordination of this effort could be situated with the Committee for Campus and Workplace Violence Prevention that was recommended elsewhere in this report.

Many of the recommendations made in this report are systemic in nature and will involve deliberation by those offices directly affected by them in their day-to-day work to decide how best to incorporate the ideas. Moreover, the Working Group that prepared the report is aware that the recommendations in this report are only a piece of the larger picture of campus safety and must be linked directly to other efforts that are underway to enhance campus safety. The careful coordination and integration of all efforts to promote campus safety is essential to ensure a

comprehensive approach. Finally, the Group is aware that any system needs to be dynamic in nature to adjust to the changes that continually emerge from the needs of the university community and new lessons learned from on-going evaluation of the system and best practices of our peers.

Presidential Internal Review Report

Background

In response to the tragic events of April 16, 2007, Virginia Tech President Charles Steger requested an internal review conducted by a working group to examine the interface between the university's student counseling services, academic affairs, judicial affairs and the legal systems. The Group was charged with examining "the existing systems and the interface between them; determining what constraints legal and otherwise hamper effective interaction among these areas." Based on the examination, the work group was also charged with recommending changes in university policies and procedures that would further enhance the interface of these important entities and, as appropriate, needed changes in laws at the federal and state levels. The context for this review was framed primarily by looking at how the system works when identifying and supporting students who exhibit at-risk behaviors for matters related to violence.

The Working Group was formed at the request and approval of the President. Membership for the Group examining the interface between student systems was determined at the discretion of the chair. Members of the Group represented all key units in the university relative to this charge. The Group met on four occasions, group members held numerous individual consultations, participated in a working session with six national experts on identifying and responding to the needs of at-risk students and participated in a day-long symposium on the same topic.

The focus of the Interface Working Group has been on describing structures, processes, and practices that Virginia Tech has in place for identifying, responding to, and supporting at-risk students. In particular, the Group has aimed to document the coordination of student services, support, and information-sharing among university units such as law enforcement, counseling, judicial affairs, residence life, university counsel, and administrative and academic units. A dimension of the group's work has included discussions regarding the complex nature of information sharing among helping professionals, students, the families of students, and off-campus partners. It is important to strike the correct balance of legal and ethical concerns regarding information-sharing, individual rights to confidentiality, the provision of support services, and safety. Thus, the Group examined what the purposes are regarding the communication about students who are at risk, who the main participants are in the conversations, what kind of actions are possible and what constraints there are to responding in a timely and effective manner. Finally, the Group examined university policies that guide responses to at-risk students with respect to treatment and sanctions.

The Group examined other university-based models designed to identify and support at-risk students. A key element in most models is the important role played by the school or university community in establishing and maintaining a safe learning and working environment in which civility, respect, personal support and an overt commitment to community building is articulated. The work of the Group has been dedicated to strengthening Virginia Tech's commitment to a safe learning and working environment that engages on and off-campus partners in advancing a community that supports all its members and is free of threats and violence.

The major findings of this report are: 1) a description of what structures and processes Virginia Tech has in place for dealing with behaviors of at-risk students and perceptions regarding the effectiveness of

those structures, 2) an examination of some of the best practices of other institutions and organizations for dealing with at-risk students and creating safe campus environments and 3) recommendations that would extend our current policies and practices by increasing sensitivity to students who not only make threats but pose a threat to themselves or the safety of the campus in general.

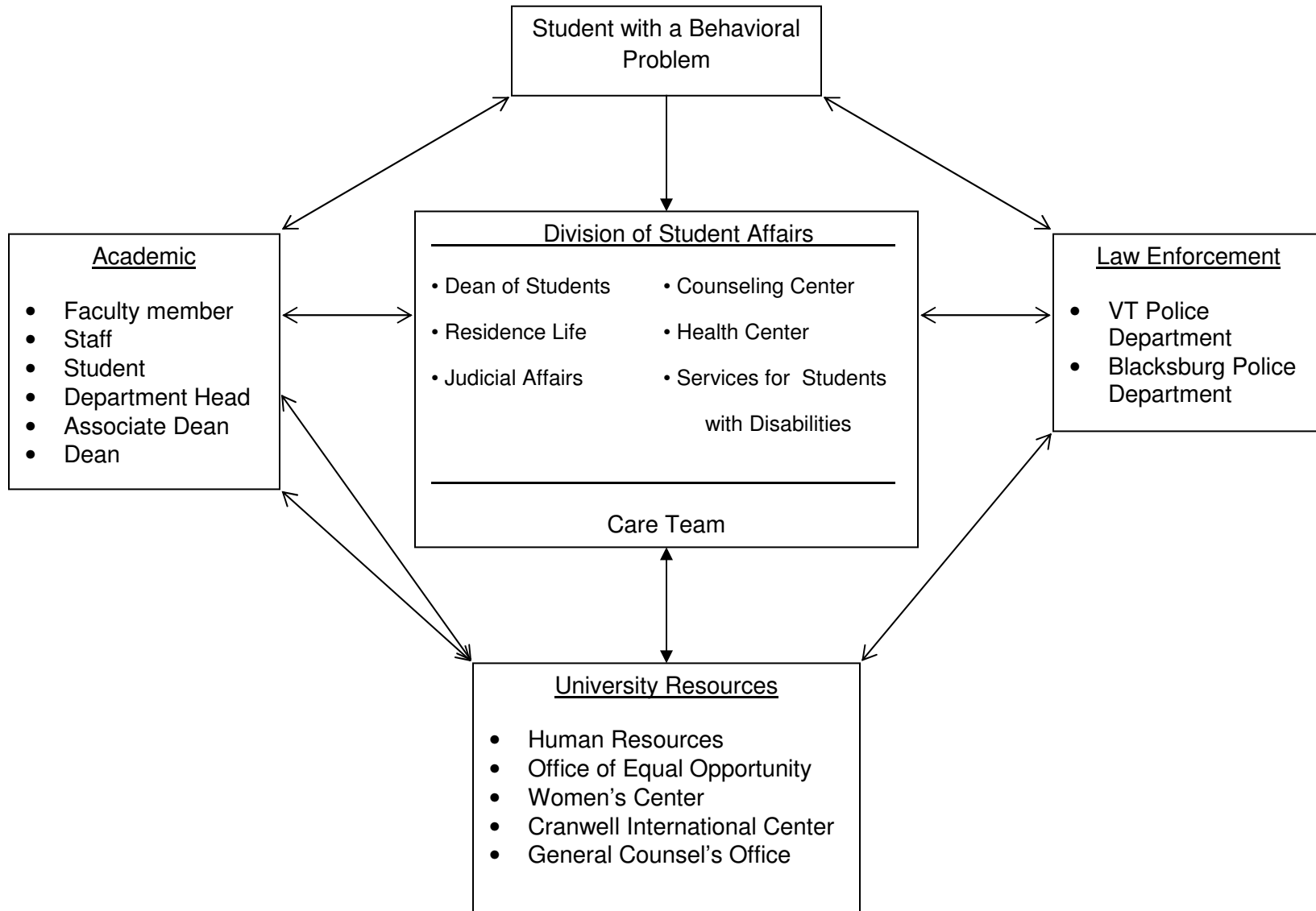
Describing Existing Structures, Policies and Procedures

Virginia Tech has created a system that is a network of structures, policies and procedures for working with at-risk students (including the potentially violent student) for the purposes of providing support to the individual student and ensuring a safe campus environment. This network and related policies and procedures have been emerging for over the past 15 years. (See Figure 1) The system is comprised of a broad array of structures that represent student affairs at Virginia Tech, including the Dean of Students Office that plays a key advocacy role, the Office of Judicial Affairs, Residence Life, Schiffert Health Center, and the Cook Counseling Center. Closely connected to the student affairs web of support are the college offices for undergraduate academic affairs, the Graduate School, and law enforcement when necessary. With regard to at-risk students, this system has the responsibility to set the policies and programs that promote a safe campus environment and to respond to students who are at risk or are an imminent danger to self or others. Each of these elements of the system has a specific set of functions. However, it is the interaction of the various units of the system that is crucial when encountering the complex cases involving at-risk students.

Care Team

One of the key integrating structures of Virginia Tech's network of support for students is the Care Team. The Care Team is convened by the Office of the Dean of Students and is comprised of professionals with direct responsibility for supporting students. The standing members of the Care Team are the Dean of Students who is the chair, the Associate Vice President for Student Affairs, the Assistant Vice President for Student Affairs (Health and Wellness), the Director of the Cook Counseling Center, the Director of the Office of Judicial Affairs, the Director of Residence Life and a representative from the Schiffert Health Center. Other representatives are invited as needed (e.g. Virginia Tech Women's Center, Law Enforcement, Office for Services for Students with Disabilities, Cranwell International Center, academic affairs administrators and faculty.) University General Counsel is invited to meetings or contacted for consultation when there is a specific legal issue that needs to be addressed.

Figure 1. Framework for Identifying and Supporting Students with Behavioral Issues



A principle responsibility of the Care Team is to respond to concerns regarding student behavior. The Care Team addresses a wide variety of concerns regarding student welfare including, but not limited to, concerns of disruptive, threatening, or violent behavior. However, the Care Team is where a student who might exhibit at-risk behaviors is identified and support services and appropriate university responses are discussed. Based on the composition of the Care Team, a comprehensive picture of the student can be constructed and an appropriate set of responses, services, and treatment strategies can be recommended. In complex cases, where there is a concern that an individual may pose imminent danger to self or to others, recommendations may be made for further action using the appropriate university procedures.

The Office of Judicial Affairs and the Cook Counseling Center are important standing members of the Care Team. During discussion of particular students, the directors of these offices may participate by informing the discussion, recommending a course of action, and/or rendering a professional judgment about the behaviors or situation in question. From another perspective, the Care Team may end up recommending that a student receive treatment at the Cook Counseling Center or be considered for a judicial action.

Judicial Affairs

The University Judicial System affects and applies to all undergraduate and graduate students and officially recognized student organizations. Its major purpose is to help create a fair, just, and disciplined university community. Records on judicial cases are considered to be educational records and are held in the Office of Judicial Affairs for five years. Since this information is an educational record, it is subject to FERPA regulations. Thus, information on judicial actions may only be shared based on an educational “need to know” basis. Because of the nature of the responsibility for the Office of Judicial Affairs, the director is a key participant in Care Team deliberations that are intended to build a comprehensive picture of a student for assessment purposes.

The judicial system handles approximately 3,300 cases per year covering a wide range of complexities. The policies and procedures that undergird the Judicial System are described in detail in University Policies for Student Life (UPSL) 2006-2007. The UPSL are approved by the Virginia Tech Board of Visitors and are reviewed annually and amended as appropriate. The UPSL include a Code of Conduct, procedures outlining due process and possible sanctions. Judicial sanctions range from formal warnings and probation to suspension or dismissal from the university. Interim or immediate suspension may be used by the university if such action is necessary to preserve the safety of persons or property. If a particularly dangerous situation arises with an at-risk student, the VT Police may be called to assess the situation as well as a university official. As part of this process, an immediate administrative medical evaluation may be requested.

Cook Counseling Center

The Cook Counseling Center is a multidisciplinary team of psychologists, counselors, psychiatrist, nurse practitioners, post-doctoral fellow, predoctoral interns, and support staff. The Center offers a wide range of mental health services to the student body including intake assessments, individual and group

psychotherapy, pharmacotherapy and medication management, after-hours on-call service for emergencies, crisis intervention, and consultation regarding student behavior to all members of the university community. In the academic year 2006-2007, approximately 2,500 students received some form of counseling and 20% of these students were evaluated for medication usage. The Cook Counseling Center is funded by the student health fee and all students who pay the fee by semester are eligible for services.

The cornerstone of psychotherapy is confidentiality; students seek help knowing that their concerns will not be shared by others without the express written consent of the student. Confidentiality in therapy is guided by the professional ethics of the mental health disciplines and by state and federal law. All the information shared in counseling, including the fact of attendance, is confidential and can only be released with the consent of the student or under a limited range of exceptions, including imminent danger to self or others, in response to a subpoena, or in cases of child abuse. This information is protected to the fullest extent of the law. It is the policy of the Center to balance the right to confidentiality with the need to protect a student who may present a danger to self or others. The Ethical Standards of Psychologists note that confidential information may be disclosed when there is a need to protect the client, psychologist, or others from harm (4.05b). Further, Commonwealth of Virginia statutes indicate that in the presence of a serious threat to health or safety, confidentiality may be breached. In these circumstances, the Center works to limit the release of information to only those with a clear need to know and to implement the least invasive course of action.

The role of the Director of the Cook Counseling Center on the Care Team is constrained by these ethical guidelines. The Director may take notes regarding students, discuss the concerns with the counseling center staff, and inform students of the concern by the university if the student is a client of the center. The Director may also offer consultation to members of the Care Team regarding assessment and intervention with at-risk students. The Director may not disclose whether the student is being seen in the Cook Counseling Center unless the student has given permission or if the student represents an imminent danger. The Director may ask a therapist working with a student to give permission to release the information that the student is being treated and then give the information to the Care Team.

At the present time, the Director of the Cook Counseling Center believes that the benefits of confidentiality and the protections afforded confidentiality under the law are appropriate. Further, the exceptions to confidentiality granted under FERPA, HIPAA, and state law mirror the ethical obligations of psychologists and do not restrict effective practice and communication within the university community and with the mental health community at large.

Law Enforcement

The Virginia Tech Police Department is a source of direct support for all units in assessing and responding to threats and acts of violence. In addition, the Blacksburg Police Department may be involved in assessing and responding to threats when the behaviors occur within their jurisdiction. Law enforcement may recommend a student for consideration by the Care Team or for possible judicial action. They may participate in Care Team deliberations, when invited, and provide direct assistance to administrators, faculty, staff and students when appropriate.

Academic Personnel

Administrators, deans and department heads, faculty, staff and students who have a concern about a student may activate the attention of the system at a number of points of entry. They may raise their concerns with the Dean of Students Office, Cook Counseling Center, the offices of Judicial Affairs or Services for Students with Disabilities and Virginia Tech Police Department if their concern is of a more immediate nature. Academic personnel can also use Human Resources and a variety of other Offices and Centers on campus such as the Women's Center and the Office of Equal Opportunity.

Communication Within the System

As with any university of its size, Virginia Tech strives to be accurate, timely, and responsive in any communications regarding safety. The Care Team plays a central role in assuring that the correct university administrators are aware of and participate in decisions for identifying and supporting students who exhibit at-risk behaviors. Balancing the sharing of confidential information with responding to a student's need for services is the domain of the professionals who comprise the Care Team.

Of significant concern in the area of communications is the need to balance information sharing with federal and state privacy laws and regulations. Additional dimensions that shape the information-sharing practices of the professionals in the university are their understandings of the parameters of laws and regulations designed to protect personal information such as the federal Family Educational Rights to Privacy Act (FERPA); the Americans with Disabilities Act (ADA); the Health Insurance Portability and Accountancy Act (HIPAA); the role of professional and licensure codes of conduct for mental health professionals, distinctions between "need to know" standards as understood by varying on-campus professionals, off-campus professionals, and the guardians and families of students.

Interconnectedness of the System

By its nature the overall system at Virginia Tech is logically connected and responsive. That is, if members of the university community have a concern and they direct it to one of the key offices, they will get support and assistance on how best to pursue their concern.

Resources for Promoting Campus Safety

A number of resources are available to members of the university community that are designed to assist and support them if they have specific concerns related to potentially dangerous situations. Two sets of policies are in place to provide guidance in providing a safe university community environment, the Campus and Workplace Violence Prevention Policy (Administrative Policy 5616) and the University Policies for Student Life (<http://www.studentprograms.vt.edu/judicial/upsl.php>). Both policies have been approved by the Virginia Tech Board of Visitors. Consistent with these policies, a number of support materials have been developed such as a *Responding to Disruptive or Threatening Student Behavior: A Guide for Faculty* (<http://www.hr.vt.edu/employeecorner/workplaceviolence/#a>) developed by the Dean of Students Office. Another helpful resource is the *Campus Work Place Violence Prevention and Crisis Management Resource Manual*, developed by Human Resources in collaboration with other units across campus. (<http://www.hr.vt.edu/employeecorner/workplaceviolence/#b>). These handbooks provide specific advice for identifying and referring distressed students and responding to

threatening and potentially dangerous situations. Moreover, the handbooks describe the key offices and structures mentioned above and describe the support that is available. The Dean of Students Office, the VT Police Department, Cook Counseling Center and the Women's Center have specific training programs related to campus safety and at-risk students and they are willing to present to faculty and staff on request. A number of units such as the Women's Center have developed specific materials for members of the university community that give guidance in matters related to violence.

Impressions of the System

Internal Perspective. The system for dealing with at-risk student is considered to be comprehensive, accessible and responsive. It is comprehensive in that all aspects of the system dealing with student behavior are linked in some discernable manner. The Care Team structure provides a space where a range of relevant information about a student can be vetted with regard to appropriate strategies for a treatment plan or other actions that need to be taken to ensure the most appropriate response to the reported behaviors. The system is accessible in that administrators, faculty, staff and students are encouraged to use the system when appropriate and informed about how to use it. The system is responsive in that members of the university community can contact any unit in the system and get advice on how best to proceed with their concern.

In discussions regarding the system, faculty and administrators expressed concerns about a lack of knowledge about how the system functions for at-risk students, including a lack of clarity of the role of the individuals who refer a case to the system and a feeling that there was inconsistent follow-up with referring parties. Some faculty and administrators who have used parts of the system commented that they often did not hear back on the disposition of the case. Faculty and staff also did not seem aware of the system or the resources available to them for responding to distressed students. Faculty often confused the Judicial System with the University Honor System. Within the system itself, some key participants from units on the Care Team described above, indicated that occasionally they felt like the information on a particular case was not as complete as it needed to be for them to function effectively. They believed that, at times, essential information was not shared because of constraints placed on conversations based on information covered by the Family Educational Rights Privacy Act (FERPA) or at least a narrow interpretation of the application of FERPA.

External Perspective. The Inspector General for Mental Health, Mental Retardation and Substance Abuse Services of Virginia conducted a review of the Critical Incident of 4/16 at Virginia Tech. This review provided a perspective that indicates that the Virginia Tech system for dealing with at-risk students may not be robust enough to provide the kind of analysis of a potential threat that is warranted by more complex, high-risk cases involving individuals with a demonstrated need for significant mental health services (Stewart, 2007). With respect to Mr. Cho, the Inspector General noted that "no single office was fully aware of the extent of the concern about the individual" (p.8). Moreover, "At the time of the TDO there was no single contact to which the CSB [Community Services Board] prescreener could go 24/7 to determine if information that may be relevant to a particular student's mental health crisis was available in the university community." (p.8)

The Inspector General had some very specific recommendations for university counseling centers in the Commonwealth including the following:

- It is recommended that university counseling centers develop a written policy regarding (a) whether or not the center will accept referrals for court ordered involuntary treatment, and if so, the types of referrals they can accept, and (b) whether or not the center will report treatment related information to the courts and/or the CSB when the client is under order to receive court ordered treatment.
- It is recommended that university counseling centers notify the courts, CSB's and BHA's in their surrounding cities and counties of this policy.
- It is recommended that the university counseling centers develop criteria and procedures for providing required treatment to students who have been deemed in need of mental health services and for whom treatment is a part of a university support plan for these students.

Examining Best Practices for Students at Risk

Safe Schools Initiative

The Safe Schools Initiative, supported by the US Office of Education, has provided guidance in helping schools learn how to respond to the problem of targeted school violence and create plans for safe campuses. While the report grew out of studies of violence in public schools, the findings of the study have relevant implications for college campuses as well. The final report (2002) suggests that institutions create strategies for preventing attacks in three areas:

- Developing the capacity to pick up on and evaluate available knowable information that might indicate that there is a risk of a targeted school attack
- Using the results of these risk evaluations or "threat assessments" in developing strategies to prevent potential school attacks from occurring.
- Engaging the school community – students, staff, and faculty – in articulating values, community norms, and behaviors that strengthen a commitment to civility, respect, and "zero tolerance" for bullying, harassing, or discriminatory behaviors. An environment that aims to invite all community members to engage in learning and working, diminishes "bystander" behavior (standing aside and witnessing bullying, for instance) and encourages individual well-being.

The follow-up guide to the final report, *Threat Assessment in Schools: A Guide to Managing Threatening Situations in Schools (2004)*, is a valuable resource that provides a framework for strengthening an institution's approach to targeted violence. The Guide specifies three elements of a good program in threat assessment: (1) authority to conduct an assessment, (2) capacity to conduct inquiries and investigations, and (3) an integrated systems approach. An essential operational feature of the suggested program is the formation of a team that is responsible for threat assessment for specific cases. While the Safe Schools Initiative focused primarily on K-12 schools, it has recently been suggested that the lessons learned from the safe schools initiative are also useful for higher education, albeit in a modified form. (Cornell, 2007). Cornell has suggested that systemic threat analysis should be a vital part of every campus' strategies for managing potential dangerous situations. Cornell suggested

further that study is needed to test previously developed models for K-12 schools in the higher education context. Other experts in campus violence also recommend having systemic threat assessment structures and processes in place in higher education as an integral part of a comprehensive program for campus safety (Pavela, 2007).

In reviewing the structure and policies of several peer institutions, the committee also found examples of structures and processes that were created to deal with students who may pose a significant potential risk to the university with regards to harm to self or others, destruction of university property or disruption of university activities. These structures were designed to complement other university structures but given jurisdiction to act quickly and decisively in cases where threat was a possibility

Sharing Critical information

Sharing critical information is one of the most important aspects of managing the potential for violence with respect to at-risk students. However, in a recent document, *Report to the President (Of the United States) on Issues Raised by the Virginia Tech Tragedy (2007)*, a common theme that emerged was that critical information sharing encounters substantial obstacles in higher education. The report found that nationally, within educational institutions, educational staff, health care professionals and public safety officials felt that the sharing of information was impeded by “information silos”. The Committee that prepared the report for the President found that there was considerable confusion and differing interpretations among professionals regarding the impact of state and federal privacy laws and regulations with respect to what information they could share with other professionals and parents when dealing with students who are at risk for violence. In their many interviews and town hall meeting, they found that it was not uncommon for professionals to incorrectly believe they were subject to liability related to FERPA and HIPPA restrictions while doing their duty when in fact they were not. The review also found that there were significant misunderstandings about the application of the laws in general and that steps need to be taken to clarify the understanding of professionals regarding the application of the guidelines of these laws as well as the constraints placed by any additional state laws.

During a Symposium held at Virginia Tech on July 13, 2007, Mr. LeRoy Rooker, Director of the Family Compliance Office, provided significant clarification to the Virginia Tech Community with regard to the application of FERPA. It was clear from the response of a number of those attending the symposium that these clarifications challenged the understandings that a number of Virginia Tech professionals had about what information could be shared and under what circumstances.

The Family Educational Rights and Privacy Act (FERPA) extends rights to students at all universities that receive federal funding. The primary rights of FERPA are the right to inspect and review education records, to seek to amend education records, and the right to have some control over the disclosure of information from education records.

The University has several outlets for providing students, administrators, and faculty with information regarding FERPA and educational records. Examples include the following:

- The front page of the VT Registrar website contains a link titled, *Student Privacy / FERPA* which hosts extensive information about the Act;
- The undergraduate catalog addresses FERPA in a section titled, *Academic Policies*;

- The Registrar’s online link *For Parents* includes a note, “The university bursar cannot discuss student accounts without the written permission of the student and refers parents to the *Student Privacy / FERPA* site;
- The *Student Judicial Procedures* brochure has a section titled, *Student Records*. This informs students of their right to privacy and that they may sign a consent form allowing the release of information to designated individuals.

There are also on-going efforts to inform the university community about the application of the operating principles of the law in day to day activities. When there is a question about the interpretation of the law, the University’s General Counsel Office is always available for consultation in more complex situations that call for application of the law to daily activities regarding information sharing.

Promoting Mental Health Awareness and Well-being

The JED Foundation was founded in 2000 by Phil and Donna Satow after they sadly lost their 20-year-old son, Jed, to suicide. The Jed Foundation is a New York-based 501 (c) (3) charitable organization with a mission to reduce the suicide rate among college and university students, across the United States. The Jed Foundation has collaborated with university and college counseling centers on strategies to increase well being among college students to reduce suicides. The Jed Foundation has created a framework to assist institutions of higher education in the management of students in acute distress. (Jed Foundation Framework, 2006). The document provides best practice advice regarding the development of three key protocols:

1. Developing a Safety Protocol
2. Developing an Emergency Contact Notification Protocol
3. Developing a Leave of Absence and Re-entry Protocol

The Jed Framework is focused on assisting universities in strengthening their mental health safety net for at-risk students. The considerations for each protocol in this framework enable an institution to review its situation with respect to its capacity for preventing serious problems or intervening when necessary and appropriate in cases of students at-risk. In addition, the Framework recommends a comprehensive “Prescription for Prevention” that connects the key elements of an effective program to promote mental health awareness and well-being.

Recommendations for Strengthening Virginia Tech’s Current System

The addition of strategic university structures, policies, procedures and services that are robust and responsive can strengthen Virginia Tech’s ability to identify and support students who exhibit at-risk behaviors. A strong foundation of written policies, transparent procedures, and uniformly agreed-upon and applied practices will result in supporting students to achieve their academic, professional, and personal goals while enrolled at Virginia Tech and contribute to a safer campus environment.

Refining the Care Team

Updating the Care Team Protocol. The long history and constructive mission of the Care Team provide a firm foundation on which to move forward. Many of its operating procedures should remain in place. However, because of the modifications that are being considered in this report, it is recommended that

the Care Team Protocol be reviewed and revised to update it with regard to purposes, membership, and operating procedures. Moreover, the presence and authority of the Care Team in the university system needs to be more formally recognized and its visibility increased. Members of the university at large should have explicit knowledge of the Care Team as a university resource.

Reviewing Membership. It is recommended that the membership of the Care Team should be reconsidered in light of its purpose. First, it is important that law enforcement be included as part of the team. It is clear from recent events that the VT Police Department is a crucial partner in working with the campus community to support all of its members and to maintain safety. Thus, including a member of the VTPD as a participant in the Care Team deliberations is essential to build a more complete and cohesive picture of specific cases. The Director for the Office for Services for Students with Disabilities should also be made a permanent member of the Care Team, as a number of students who are at-risk often have come to the attention of that Office. It is appropriate that the Dean of Students be formally designated as the chair if the Team keeps its function as presently designed. However, based on new organizational structures recommended in this report, the overall membership of the team should be reviewed. A list of consultative members should also be reviewed and specified.

Modifying Procedures. Since the oversight responsibility of the Care Team will likely increase, it is suggested that a system of more formal agendas and case notes be constructed. It makes sense that the Dean of Students assumes the responsibility for these functions to ensure the preservation of records for longer-term consultation on cases. It is also recommended that a careful review of records storage and information sharing policies be conducted and a specific records sharing protocol be created in consultation with legal counsel.

Securing Relationships. While the Care Team currently includes academic personnel in its deliberation when it is relevant, it is recommended that this process be more formalized. One important aspect of this recommendation is that the Academic Deans for Undergraduate studies be connected to case deliberations either during discussion of the case or in follow-up discussions. Connecting the College Dean's Office can help ensure that a holistic picture of a student is being formed and considered in assessment and intervention. It is also important that the Graduate School be explicitly connected to Care Team deliberations when appropriate. These relationships should be clearly described in the revised Care Team Protocol.

Creating a Threat Assessment Team

The system for identifying and intervening with students who pose a risk to themselves or to campus safety should be strengthened by incorporating a more systematic approach to threat assessment. Therefore, it is recommended that a Threat Assessment Team be formed and a protocol established that specifies the jurisdiction of the team, membership, procedures and relationships to other structures such as the Care Team that are responsible for student welfare and campus safety. Guidance in creating this protocol is available in the materials from the Office of Safe Schools in the U.S. Department of Education.

It is essential that this Team be charged with building a complete fact-based picture of any individual who is considered a risk to him or herself or to the campus community and have authority to recommend significant and timely interventions to ensure the safety of the individual and others in the

campus community. The Team should be closely linked to the Care Team, with overlapping membership, but should function independently. Typically the Care Team may be the referring agent but allowance should be made for direct recommendations from other units of the university. The Threat Assessment Team's recommendations and action plan would be enacted by the Associate Vice President for Student Affairs. The Team must be able to act decisively and quickly. It is important that all members of the team have training in the threat assessment process for schools. The Office of Safe and Drug Free Schools in the USDOE is a resource that can provide this training. A request should be made to that Office to initiate the appropriate training. Finally, a review of possible actions that can be taken by the Threat Assessment Team needs to be conducted. Currently, the university has a policy for interim suspension but does not seem to have a wider range of options for dealing with acutely distressed students in crisis situations including a medical or psychological leave policy. A study should be conducted that looks at a full range of options that the Team or other appropriate units may use in emergency situations with acutely distressed students.

Expanding Case Management Capacity

Sound case management is the cornerstone for effective identification, intervention and follow-up services. Currently there are no case managers with specific functions in the Division of Student Affairs. The existing case management effort is embedded in the services offered by the Cook Counseling Center, actions taken by the judicial system, contact with the Dean of Students Office and the Academic Dean's Office and or consideration by the Care team. The reality of this arrangement is that fragmentation can occur with respect to comprehensive assessment and treatment. Moreover, follow-up efforts with other relevant persons in the student support network regarding their involvement and the determination of the effectiveness of the intervention may be truncated without this capacity. Increasing the capacity of case management for at-risk students in the Virginia Tech system will improve the responsiveness of the system to the more complex and intractable cases by coordinating intervention options and providing an up-to-the moment monitoring of acute cases of students at-risk. Thus, it is recommended that two case managers be hired both for the Dean of Students Office and the Cook Counseling Center to increase the capacity and quality of care by carefully monitoring intervention and connecting with all relevant agencies and individuals.

Students receiving mental health services on and off campus, including medications and hospitalizations, will benefit from medical case management that is coordinated by the Cook Counseling Center. This form of case management involves working with the student, with their consent, to monitor on and off-campus mental health services and assuring that these services adequately meet the needs of the student. Another form of case management, delivered by the Office of the Dean of Students, involves working with a student whose needs include coordinating with on-campus services such as those offered by the Office of Services for Students with Disabilities, Residence Life, the Women's Center, and communications with the student's academic dean, faculty members and academic advisor

Improving Communication in the System

One of the most important aspects of creating a successful system for working with at risk students is to have an accurate, timely, and accessible flow of information regarding the student. Thus, the communication system must be comprehensive, secure and responsive.

Conduct an On-going Review of the Application of FERPA within the University. During the course of this review it became clear that Virginia Tech was similar in many respects to other institutions across the country as reflected in the Cabinet level report submitted to the President of the United States. That is, there was considerable variance in the interpretation and application of FERPA. The lack of a consistent knowledge basis for applying FERPA may well block the flow of information that is necessary to form a comprehensive picture of an at-risk student. Thus, it is recommended that the University conduct an on-going study of its application of FERPA with respect to existing policies and procedures as well as the influence on new ones that may emerge from changes recommended in this report. This study should yield more explicit understandings of the influence of FERPA on critical information sharing and provide recommendations for training for members of the university community. An outcome of the study should include suggestions for an on-going training program for administrators, faculty and staff.

In accordance with the advice of LeRoy Rooker, the Committee recommends that Virginia Tech should broaden its definition of the release of FERPA-protected information to school officials who have a legitimate educational interest so that information which should be shared from the various "information silos" can, in fact, be shared. The University should adopt the definition given in the "Model Notification of Rights under FERPA for Postsecondary Institutions" suggested on the Department of Education web pages as follows:

"The University discloses education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by the University in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person with a company with whom the University has contracted as its agent to provide a service instead of using University employees or officials (such as attorney, auditor, or collection agent); a person serving on the Board of Visitors; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or *at* her professional responsibilities for the University."

Enhancing Comprehensive Assessment of a Case . A protocol needs to be developed that provides guidance to professionals throughout the system to ensure that serious incidents are reported centrally (perhaps to the Dean of Students Office). This sharing of information is particularly important when information is shared across units such as from academic affairs to student affairs. It will also be important that colleges have consistent reporting processes from academic departments to the deans' offices.

A second link that needs to be strengthened to ensure that a comprehensive picture is possible is that clear lines of communication between the counselor on call and the two administrators on call need to be established so that all available information which can be shared is, in fact, shared.

Establishing a Central University Contact for Information regarding a Student at Risk. It is important that at least one person, preferably with a designated back-up, be assigned the responsibility for having the most comprehensive picture of a student. The Dean of Students who chairs the Care Team and oversees

its records is perhaps in the best position to serve this role. Such a designation would mean that the Dean would also serve on the Threat Assessment Team. This university contact should be available 24/7 for consultation with outside agencies, consistent with applicable law, who may be involved with a student who is a high risk for violence to self or others.

Communicating with Outside Agencies. It is recommended that the university articulate its policies on communication of vital information to outside agencies on cases that have relevance to campus or individual safety, while observing both legal and ethical imperatives regarding information sharing. Similarly, it is vital that ongoing conversations are initiated with the primary outside agencies that typically deal with VT students who are acutely distressed. Again, it is recognized that there are legal and ethical constraints about what information may be shared but it is clear that a mechanism to promote on-going dialogue between university services and local services or institutions is needed. Such dialogue is fundamental to building the kind of interagency relationships that foster collaboration.

The Cook Counseling Center should engage other colleges and universities within the Commonwealth in a discussion of the Inspector General's recommendations regarding outpatient commitment, mandatory counseling, and relationships with external agencies such as the Community Service Boards and local area hospitals. Following the framework of the Jed Foundation, the Cook Counseling Center should develop clear policies and procedures for assisting students who are hospitalized, require medical leave, and then seek return to the university campus.

Communicating with Student's Support System in Emergencies. In times of emergency it is important that the university be able to contact someone on students' behalf if they are unable to do so. Currently the data base for emergency contact information is uneven and often not updated in a timely manner. While the University requests emergency contact information at the time of admission (associate, undergraduate, graduate and professional) it is not a required entry. The majority of students fail to provide this information. In fact, in times of emergency the most pertinent information is available only in a paper file available in the University Registrar, College or Academic Department offices. Access to that information during non-standard work hours prohibits university personnel from responding as quickly as possible in emergencies. It is recommended that the university require all students to provide or to affirm the entry of emergency contact information at the time of registration. It is the student's sole purview as to the identity and type of contact information provided. The requirement however, will be to provide the minimal information prior to obtaining access to registration. The Committee urges the University to implement this recommendation Fall 2007.

Training of Administration, Faculty, Staff, and Students in Campus Safety and Violence Prevention

The work of the Safe Schools Initiative, the Jed Foundation, and others that have explored the prevention of campus-based violence indicate the importance of all members of a school community in identifying and intervening with individuals who might be at risk for perpetrating violence. To this end, Virginia Tech must strengthen its efforts in educating its members on the identification of and prevention of violence. A community that embraces civility, respect, and a cordial regard for all its members is a community that values well-being and the synergy that is created by mutual learning and teaching. Reaching out and providing education to all the communities that comprise the university will help create a foundation, one upon which university structures such as the Care Team can continue to identify and serve students at risk. If faculty, staff, and other students feel sure in their ability to secure

assistance for a colleague about whom they are concerned, individuals who might not have received services might benefit from assistance and intervention.

There has been extensive university attention devoted to training members of the university community related to issues of violence. However, there is a need to redouble efforts in this regard. Because individuals tend to process information that they judge to be relevant to them, they may ignore policy and procedures related to campus violence until they need them, which is often too late. Another contextual factor that presents a challenge for training is that the university community membership is extremely fluid, with hundreds of new faculty and staff hired each year. Thus, training strategies must be created that overcome these contextual constraints to provide necessary education regarding violence prevention.

Attention should be given to the training of administrators, especially newly appointed ones, regarding policies and procedures for violence prevention so they are aware of whom to contact and how to behave when a difficult situation arises with a distressed student or employee. These administrators also serve as an important link to other faculty and staff in their unit on new policies and procedures related to violence prevention. The implementation of an approach to training that focuses on better access to resources and on-going training is also required. An example of a strategy to make information on campus safety more accessible would be the creation of a mechanism that specifies resource sites related to campus safety that can be distributed to all members of the university community quickly and inexpensively, similar to the sticker that was created by the Dean of Students Office in the past to inform students, faculty and staff about key resource sites. Another approach used by some colleges is to have Campus Safety as a main button on their web sites that provides easy access to resources for campus safety. Such a link would take individuals to related sites quickly and directly.

It is important to underscore that strengthening and broadening training should be predicated on what programs and strategies are already available in a number of units in the university. Thus, a review of all efforts to promote campus safety and violence prevention should be undertaken that focuses on best practices, points of synergy and gaps or inadequacies in current training programs.

A specific resource in this regard is the threat assessment training offered by the Office of Safe Schools and the U.S. Secret Service. This fall, these departments have offered to conduct a training seminar on the Virginia Tech campus for law enforcement, student affairs personnel, and appropriate academic administrators.

Extending the Campus and Workplace Violence Prevention Policy

While this review is intended to be a systemic analysis of the university's capacity and ability to work with students who are at risk with potential for violent behavior across the boundaries of student affairs, law enforcement, the legal system, and academic affairs, the review takes place in the context of the broader environment of Campus and Workplace Violence. To that end, the Campus and Workplace Violence Prevention Policy (VT Policy 5616) provides an important foundation for further efforts in the on-going process of ensuring a safe campus environment. The policy is designed to provide a comprehensive and integrated approach to creating a safe campus environment. It forms a vital umbrella to coordinate the overall approach to ensure a safe campus environment. It is not sufficient to strengthen only parts of the system for dealing with violence. That is, in addition to attention to at-risk

students, it is essential that we have comparable, but not necessarily identical structures for employees, who may be considered at risk as well. Thus, it is recommended that under Policy 5616, additional structures including a threat assessment process be instituted for at-risk employees. To oversee this process, it is recommended that a Violence Prevention and Risk Assessment Committee be constituted immediately to provide a university-wide perspective on all systemic efforts to provide campus safety. The membership of this committee should represent senior university administrators from the primary areas who are able to provide leadership and support resource requests to effect important policy and operational procedures. This Committee, for example, might provide oversight and coordination to the implementation of a number of the recommendations of the three internal reviews recently initiated by the President.

Building Community to Promote Individual and Community Well-being

A strong, vibrant and supportive community is essential in ensuring a safe campus environment. An environment that promotes civility, works toward the acceptance of others' differences, strives to include rather than exclude and provides assistance to those in need is fundamental to a safe campus. Virginia Tech has instituted a number of efforts to provide such an environment. The recent adoption of the *Principles of Community* and the development of strategies for infusion of the *Principles* in the day-to-day life of the University is an example of specific efforts to build community. Other efforts such as Safe Watch, the Employee Assistance Program and programs in Multicultural Affairs and Residence Life are examples of the kind of proactive programs that promote community well being. The long-term effects of these programs on the campus climate cannot be under estimated. It is recommended that a more systematic approach be instituted that specifies campus-well being as a goal. The coordination of this effort could be situated with the Committee for the Prevention of Work Place Violence and Campus Safety recommended earlier in this report.

Additional Considerations

In conducting this review, the Interface Working Group has encountered a number of important issues that need further consideration within the university community. These issues are relevant to the overall well-being of the campus community but need extended discussion before specific recommendations can be made.

Family/University Partnership

It is clear that the well-being of students is furthered by a constructive partnership between parents and the university. The dimensions of this partnership are often confounded because of issues related to the developing independence of the student, legal issues regarding notification and basic privacy rights of students as adults. It is apparent that an on-going dialogue around this issue with students, parents and university professionals could help forge new understandings and models for university/home collaborations, particularly for at-risk students. Clarification of policies regarding communication with parents regarding student behavior, academic progress, and health related issues is necessary.

Admissions Information

A number of times during committee deliberations the issue of admissions screening for students was raised. It seems appropriate that some discussion be held reviewing what our policies and procedures are for collecting information regarding students at the time of admission to determine if we are securing all the relevant background information that we need on students and how that information is reviewed by the system.

Medical Leaves and Other Enrollment Strategies

A number of peer institutions, as does Virginia Tech, have processes for granting students a leave without academic penalty in times of crisis. However, a more thorough review is needed to determine if VT policies and procedure in this area are sufficient; the university must determine what a reasonable set of policies would be; when such policies would be invoked; and how they would be implemented during voluntary and involuntary situations. The Ohio State University, for example, has a set of policies that can be used by their Consultation and Assessment Team including Interim Suspension, Administrative Disenrollment, Enrollment Denial for Medical Reasons, Disenrollment from a Course and Code and Judicial sanctions.

Interim Suspension Policy and Procedures

The policy for Interim Suspension is one of the specific interventions the university can use in emergency situations with students at risk. A review of the efficacy of the current policy and its implementation should be conducted.

Judicial Affairs Case Monitoring

Examining the role of the Judicial Affairs Office with regard to monitoring a case in which a student may pose a potential threat but has not been charged or convicted of a judicial offense would be helpful. If practical for the Office, this strategy to engage cases in their early stages could help prevent them from escalating.

Working with the Resistant Student

Support systems have a much higher probability of success when the students who need assistance accept it. However, students who pose a potential threat often resist efforts to help them. Each of the offices mentioned earlier in this report, including the Care Team and the Threat Assessment Team, need to be clear on how to respond to the resistant student.

Responding to Disturbing Writing

An on-going dialogue needs to be held to help faculty understand how to respond to disturbing student writing. At the same time we strive to create a safe campus environment as possible, we must also preserve freedom of expression in the arena of student writing. The vast majority of writers who frequently focus on disconcerting material are mentally healthy, human beings. In our efforts to create a safer campus environment, we must resist the urge to censor student writing or to discourage students from examining their own occasionally dark depths of emotion. On the other hand, we must be able to give faculty guidance in helping them recognize situations when disturbing writing may be related to a broader pattern of behavior that requires attention.

Action Plan Statement

The recommendations made in this report are consistent with the goals of a grant submitted to the US Department of Education by the University. The grant will provide funds to Virginia Tech to enhance its efforts in assessment, case management, for students and employees, education and outreach, and dissemination to the higher education community nationally to facilitate the sharing of best practices. A key operational structure in the grant is a university-wide Task Force to examine, recommend and facilitate the implementation of new policies and procedures for identifying and supporting students and faculty who exhibit at-risk behaviors. The findings and recommendations of this report will provide a point of departure for the work of the Task Force over the next year. The Task Force should have responsibility for overseeing the implementation of the recommendations in this report that are accepted for further action.

Summary

The recommendations contained in this report are intended to strengthen and complement Virginia Tech's commitment to Community. Building Community requires time, resources, education, involvement and planning. Building Community demands the exploration of boundaries and the examination of tenets. By its very nature, Community is dependent on each member's commitment to its vitality and safety. Community serves individuals and the whole. Community for at-risk students and employees neither disregards individual privacy nor incubates violent or disruptive behavior. Community is designed for the holistic development of its members and has systems in place that add value to members.

Many of the recommendations made in this report are systemic in nature and will involve deliberation by those offices directly affected by them in their day-to-day work to decide how best to incorporate the ideas. Moreover, the Interface Working Group is aware that the recommendations in this report are only a piece of the larger picture of campus safety and must be linked directly to other efforts that are underway to enhance campus safety. The careful coordination and integration of all efforts to promote campus safety is essential to ensure a comprehensive approach. Finally, the Group is aware that any system needs to be dynamic in nature to adjust to the changes that continually emerge from the needs of the university community and new lessons learned from on-going evaluation of the system and best practices of our peers.

Resources

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