

Title: Behavioral Intervention Team Procedure 2.15P

Based on Rule 2.15

Effective Date: April 11, 2022

A. <u>Purpose and Intent</u>: The purpose of the Behavioral Intervention Team (BIT or "Team") is to identify, assess, and respond to behavior that may pose a threat of harm to Santa Fe College students, employees, and/or invitees, thereby encouraging an environment of increased safety. The BIT is designed to provide a coordinated referral system, a detailed behavioral assessment process, an internal communications structure, an intentional intervention strategy, and a comprehensive monitoring system to allow for follow-up and support.

B. Definitions

- "College premises" is defined as any location, either permanent or temporary, owned, leased or under the control of Santa Fe College or the Santa Fe College Foundation (if being used by the College). This includes but is not limited to the buildings, grounds, right of ways, surrounding perimeters, parking lots and sidewalks, athletic fields, classrooms, halls, leased space, alternative work locations or any class location.
- 2. "Threat" means an expression or action that suggests physical or mental harm. An expression constitutes a threat without regard to whether the party communicating the threat has the present ability to carry the threat out and without regard to whether the expression is contingent, conditional or future.

C. <u>Jurisdiction</u>

This procedure is designed to apply to members of the College community (e.g. employees, students, visitors, applicants, and guests) with regard to behavior on or off College premises that may be deemed to be a legitimate concern and a potential threat of harm to the College and/or members of the College community

In all known cases of perceived or actual threatening behavior that affect the College or members of the College community, the BIT will determine if the Team will hold jurisdiction and/or refer the behavior to others within the College or external care groups.

D. <u>Duties</u>

BIT duties include, but are not limited to, the following:

- 1. Receive and review referrals.
- 2. Investigate allegations of threatening behavior.
- 3. Maintain intervention and support strategies.
- 4. Monitor individuals whose behavior creates a concern about risk to themselves, another person, or the College.
- 5. Make recommendations to college officials in accordance with college policies and procedures.
- 6. Engage in ongoing professional development, assessment, and refinement of BIT procedures and protocols at least annually to foster optimal Team functioning and accountability.
- 7. Engage in ongoing professional development and cross-training activities with ITS (Cyber Threats) and Facilities (Infra-Structure Threats) to foster inter-area threat management coordination.
- 8. Take actions as defined herein.
- 9. Identify systemic issues, including college policy and procedural issues warranting further examination, and refer such matters to appropriate College authorities.
- 10. Assist in educating the College regarding threat identification, assessment, and management.
- 11. Assign follow-up tasks as needed.

E. College Community Responsibility

The BIT relies on the College community as observers, and therefore students, faculty and staff have the obligation to notify the Police Department or Counseling Center if they become aware of threatening behavior or behavior that causes concern.

F. Team Members

As authorized by the Board of Trustees, the President will appoint team members.

The permanent membership of the Team will include a representative from the President's Office/Legal Counsel, the Police Department, Student Affairs, Academic Affairs, the Student Conduct Office, and the Counseling Center.

Each standing member should have a designee appointed in case the Team member is unable to attend a meeting. Consistency in attending meetings is critical to the functions of the BIT. The BIT may consult with College officials who are not members of the Team on as-needed basis to assist in individual cases.

The President may remove or replace any member of the Team with or without cause at any time.

G. Meeting Schedule

The Team will meet regularly. The BIT anticipates meeting at least twice a month and as circumstances require. As needed, a subset of the BIT may meet more often.

H. Organization

The Chair and Vice Chair of the BIT will be determined by the Team. The Secretary, if any, will be appointed by the Chair.

I. Actions

The BIT is empowered to take timely and appropriate action, consistent with the judgment of the team, college policy, and applicable law. Upon receiving a referral, the BIT may take one or more of the following actions or other alternatives as determined by the Team:

- 1. Determine if potential threat exists and assign tracking categories:
 - a. Active threat/intervention
 - b. No current actions
 - c. Archived
- 2. Assign Team member(s) to case as lead and for follow up;
- 3. Make a referral to the College Counseling Center;
- Require a mental health assessment, at the College's expense, by an assessor
 of the College's choosing. The Team will not be bound by the opinions and
 recommendations contained in such an evaluation;
- 5. Require a mental health assessment, at the expense of the person of concern, by an assessor of the College's choosing. The Team will not be bound by the opinions and recommendations contained in such an evaluation;
- 6. Issue a "No Contact Order" to parties;
- 7. Refer the issue to a department on campus (e.g., Human Resources, Academic Affairs, Student Affairs, SFPD);
- 8. Refer systemic department issue(s) to area Vice President and recommend appropriate professional development to address area needs;
- 9. Require training(s);
- 10. Recommend counseling sessions;
- 11. Require meeting with a counselor;
- 12. Flag student and employee records;
- 13. Place student records on "History" status;
- 14. Require successful completion of a behavioral contract;
- 15. Recommend issuance of a trespass:
- 16. Recommend an interim suspension;
- 17. Recommend a fitness for duty evaluation:
- 18. Require adherence to health or medical directions;
- 19. Determine that there is insufficient evidence for additional actions:
- 20. Provide incident review and support, as warranted, for ITS (Cyber Threat) and Facilities (Infra-Structure Threat) investigations.

J. Follow-Up

The Team should make recommendation(s) on an action plan and follow-up. An assigned Team member is responsible for follow-up as directed by the Team. The assigned member shall report back to the Team or utilize appropriate systems to report on the follow-up at regularly scheduled Team meetings.

The Team should keep a record of any recommendations and rationale for final actions but not necessarily of deliberations.

K. Care Function

The BIT may determine that an individual's behavior does not pose a threat of harm to the College but does show signs of distress such that the College should intervene for the support and care of the individual. In such cases, the BIT shall refer the individual to the appropriate departments, persons, and/or resources at the College best suited to support the individual exhibiting the distressed behavior. Sometimes identified as the "Care Team," such departments, persons or resources may include, but are not limited to, the Counseling Center, the Ombudsperson, the Disabilities Resource Center, Veterans and Military Success Services (VMSS), and the Employee Assistance Program. Appropriate Care Team members shall keep the BIT informed of the status of such individuals referred to them.

L. General

1. Information Sharing

BIT members performing their roles as members of the Team are school officials with legitimate educational interests in education records for the purposes of the Family Educational Rights and Privacy Act, as amended (FERPA), and Florida Statute (FS) Section 1002.225. Accordingly, BIT members may access personally identifying information from student education records and share such information with other members of the Team in order to fulfill their professional responsibilities for the College. Personally identifying information from student education records may be shared outside the BIT only in accordance with FERPA (e.g. in connection with a health and safety emergency) and any other relevant law.

The records of the Team will be protected from disclosure and restricted to only those authorized.

2. Rules of Evidence

Formal rules of evidence shall not apply in this process. In making a determination of the facts, the Team shall use a preponderance of the evidence as its standard of proof.

3. Records

The information, meetings, and/or records authorized by this procedure and generated by the Team are intended for security purposes and as part of a security system plan.

4. Confidentiality

As permitted by law, the information and/or records of the BIT will be kept confidential and exempt from disclosure.