

THE CITADEL
The Military College of South Carolina
171 Moultrie Street
Charleston, SC 29409

MEMORANDUM
NUMBER 2-023

09 November 2010

CAMPUS ASSESSMENT TEAM

1. PURPOSE

The Citadel is concerned about the safety, health, and welfare of all of its students, faculty, and staff, and is committed to providing an environment where individuals are free to work, learn and teach. To further these goals, The Citadel hereby creates the Campus Assessment Team (CAT). The purpose of this Memorandum is to establish policies and procedures for the Campus Assessment Team.

2. REFERENCE:

- A. Clery Act
- B. 20 USC §1232g (Family Educational Rights and Privacy Act)
- C. Section 504
- D. ADA

3. DEFINITIONS

4. POLICY

- A. The Campus Assessment Team (CAT) is a multidisciplinary team whose mission is to make individualized and objective assessments of an applicant's or a student's ability to safely participate in The Citadel's program, to detect patterns and trends in individual or group conduct, and to provide consultation and support to faculty, staff, and administration in assisting students who display concerning or disruptive behaviors. The CAT will meet regularly to assess prospective or current students' ability to comply with the physical and behavioral requirements of The Citadel's program; to receive reports and gather information to assess situations involving current students who display concerning or disruptive behaviors; to connect students with needed campus and community resources; to recommend appropriate intervention strategies or disciplinary sanctions; and to monitor ongoing "red flag" behavior of students who have displayed disruptive or concerning behavior.

The Citadel encourages all students to identify emergency contacts and authorize release of information each school year. The Citadel will contact emergency contacts in situations where a student gives sufficient cumulative warning signs that lead the school/school officials to believe that the student may be a danger to himself / herself or others.

B. Membership

1. Permanent Members

- a. Provost (Chair)
- b. Commandant
- c. Associate Provost for Academic Affairs
- d. Director of Counseling Center
- e. Director of Academic Support Center

2. Itinerant members

- a. The Citadel Surgeon (for cases involving health or physical condition of an applicant, cadet, or student)
- b. Chief, PSAF (for cases involving disruptive or disturbing behavior)
- c. Director of Admissions (for cases involving applicants for admission / readmission to Corps of Cadets)
- d. Associate Provost for Planning, Assessment, and Evaluation and Dean of Enrollment Management

3. *Ad hoc* members

- a. Battalion and company tactical officer
- b. Company academic advisor
- c. Cadet's academic advisor
- d. Athletic coach or club advisor/supervisor

Any member of the CAT may send a delegate to act in his / her stead. The General Counsel, or designee, shall serve as counsel to all meetings of the Campus Assessment Team.

C. Reporting: It is the responsibility of every administrator, faculty member, staff member and student to take any threat or violent act seriously and to report those students who show any type of behavior that could threaten their own safety or the well-being of The Citadel community.

1. Any individual who believes there is an immediate danger to the health or safety of any member of The Citadel community should contact Public Safety.
2. Disturbing behaviors and/or potentially dangerous situations should be reported to any member of the CAT, a tactical officer, academic advisor or other Citadel representative. The CAT encourages, but does not require, the use of Annex A to report concerns. Reports may be made in person, telephonically, by email or text message, or through any other medium which provides the CAT with sufficient information to identify the individual at issue and the nature of concern.
3. All reports of violence will be handled in a confidential manner, with information released only on a need-to-know basis within the campus community and in accordance with federal and state laws and regulations.
4. Retaliation. Retaliation against any person who files a report pursuant to this policy is strictly prohibited, and grounds for discipline.
5. Confidentiality. Every effort will be made to protect the safety and anonymity of anyone who reports concerns about a threat or act of violence.

D. Reasons for Referral: Individuals that qualify for CAT referrals include the following:

1. An applicant for admission or readmission to the College whose file indicates an inability to comply with the physical requirements of The Citadel, such that the applicant would be a danger to himself / herself or others.
2. An applicant for admission or readmission to the College who has been convicted of a crime involving assaultive or felonious behavior, who has a record of violent behavior, or who has a record of academic dishonesty or disciplinary rule violations elsewhere;
3. Any student who demonstrates disruptive behavior that interferes with the mission and/or normal operations or activities of The Citadel, its students, faculty, and staff. Such behavior includes, but is not limited to:
 - a. Self-injurious behaviors: Overt, self-injurious physical behaviors or threats of self-injurious behavior (e.g. expressions of suicidal thoughts or actions, self-inflicted wounds, ingestion of toxic substances, overdoses of prescribed medicines).
 - b. Threats of or damage to property or other persons;

- c. Acts indicating that the student is out of contact with reality and/or unaware of the consequences of his/her actions.
- 4. Cadets who exhibit continuing inability to meet physical requirements of The Citadel educational program. Such inability may be manifested by, among other acts:
 - a. Visiting the Infirmary 21 times or more during a single semester, or spending 21 days or more on some combination of "X" status, medical leave, in-patient status, etc.
 - b. Temporary Duty Status lasting significantly longer than anticipated for a particular illness or injury.
 - c. Major illness or injury which may preclude cadet participation in military, athletic or academic duties for a protracted period.
 - d. Fourth class cadets missing a significant portion (more than 30%) of the fourth class cadre training period.

The Citadel Surgeon is responsible for monitoring cadet "X" status, medical leave, Infirmary usage, etc., and will refer appropriate cases to the CAT.

- 5. Non-cadet students who exhibit continuing inability to meet the physical requirements of The Citadel educational program. Such inability may be manifested by, among other acts:
 - a. Ten (10) or more class absences due to health issues
 - b. Major illness or injury which may preclude student participation in academic duties for a protracted period.
- E. Risk Assessment: The CAT makes individualized and objective assessments of a qualified applicant's or student's ability to safely participate in The Citadel's program based on reasonable medical judgment relying on the most current medical knowledge, as appropriate, and/or the best available objective evidence. This evidence may include:
 - 1. The nature, duration and severity of the risk presented by the student;
 - 2. The probability that the potential harm will actually occur; and
 - 3. The likelihood that reasonable accommodations or mitigating measurements will sufficiently reduce the risk. In determining whether accommodations are reasonable, the CAT will consider whether the accommodations will:
 - a. Require fundamental alterations to The Citadel's program,

- b. Require The Citadel to lower institutional standards, or
- c. Will impose an undue burden on The Citadel

F. Procedure for Cases Involving Applicants for Admission or Readmission

Most cases involving an applicant for admission will be handled administratively by the Office of Admissions, in consultation with the Citadel Surgeon or Provost, as appropriate. However, any office may refer an applicant's file to the CAT.

1. Upon receipt of a report that an applicant may be unable to comply with the physical requirements of The Citadel, or has a history of criminal or violent behavior, the CAT will review the applicant's file. Normally, the CAT will convene to review the applicant's request and make a decision regarding admission or readmission. However, the Chair may elect to have the CAT determine a request for readmission by email or other electronic means. If any member of the CAT requests that the CAT meet to discuss such a case, the Chair will convene the CAT at the next available opportunity
 - a. In the event of referral for apparent inability to comply with the physical requirements of The Citadel, the CAT may request additional medical reports from the applicant.
 - b. In the event of referral for previous criminal or violent behavior, the CAT may consider information which indicates, among other factors, whether the applicant has an understanding of the past offense, the ability to learn from the experience, and a desire to obtain an education in order to fulfill future goals.
2. Prior to making its determination, the CAT may, but is not required to, interview the applicant. The CAT may designate an individual member of the CAT, or another college official, to conduct the interview on behalf of The Citadel.
3. The CAT only determines whether a referred applicant's physical condition or past behavior disqualifies him/her from admission to The Citadel. The Office of Admissions is responsible for evaluation of the applicant's academic and other qualifications, but will take no further action on applications referred to the CAT until the CAT reaches its decision.
4. Company Assignment (Corps of Cadets only): Cadets returning from any type of suspension or dismissal are not guaranteed to be able to return to their former company or battalion. In accordance with the College Catalog, the Commandant of Cadets or his designee will assign all such returning cadets to a company and battalion in accordance with the needs of the South Carolina Corps of Cadets (SCCC). The decision of the Commandant on these matters is final.

5. Deadlines: Applications for readmission must be submitted in accordance with the following schedule.

For Admission in:	Deadline
Fall semester	June 1
Spring semester	October 1
Maymester and Summer I	March 1
Summer II	April 1

G. Procedure for Cases Involving Students Referred for Potential Inability to Meet Physical Requirements

1. Upon receipt of a report that an enrolled student may be unable to continue at The Citadel as a result of physical limitations, the CAT will meet to review the student's file.
2. The student will appear before the CAT to show cause why he or she should not be withdrawn from the College. During this hearing:
 - a. The College Surgeon will describe the physical condition which has led to the student's referral to the CAT.
 - b. The Commandant will describe the training missed or to be missed.
 - c. The student will be afforded the opportunity to provide information in response to the College's information, including medical reports or other appropriate documentation.
3. The CAT may refer the student to appropriate resources for additional evaluation or treatment. The CAT may consider any failure or refusal to undergo such evaluation or treatment.
4. After review of all pertinent details, the CAT will make one of the following recommendations:
 - a. Continuation in student status.
 - b. Continuation in student status with follow-up review.
 - c. Medical discharge.
 - d. (Cadets only) Referral to a Commandant's Board for malingering.

H. Procedures for Students Posing a Danger to Self, Others, or College Property

Upon receipt of a report that a student may pose a danger to himself / herself, others, or college property, the CAT will meet to implement the assessment process. The most appropriate response, including the time to include the student in the process, will be determined on a case-by-case basis. In cases determined to warrant immediate action, the CAT may initiate a temporary suspension from The Citadel, pursuant to Memorandum 2-9 Temporary Suspension of Students. If the student is hospitalized at any point after receipt of a report, the CAT may delay further action, pending receipt of sufficient information to reach a conclusion, but will confer no less than every two business days until the student returns or is discharged from The Citadel.

1. Preliminary information gathering: At any time after its receipt of a report, the CAT may use one or more of the following processes, among others, to collect information about the concern:
 - a. Interviews with all available parties with information about the situation;
 - b. Interviews with the person alleged to have displayed inappropriate/concerning behavior;
 - c. Interview with any identified potential targets of inappropriate/concerning behavior;
 - d. Contacting a student's parents or family members;
 - e. Review of student's academic and disciplinary history;
 - f. Legal/criminal background check;
2. Assessment by counselor/mental health professional:
 - a. At any time after receipt of a report alleging that a student is a danger to himself, others, or college property, the CAT may direct the student(s) involved to participate in an assessment at the Counseling Center. The type of assessment will be dependent on the behavior.
 - b. Typically, students are required to participate in a four (4) session assessment by the Counseling Center. Students involuntarily hospitalized for alcohol / drug use are required to participate in an assessment and an eight (8) session group with students who have been involved in similar incidents.
 - c. Students who disagree with the assessment or counseling requirement may request a meeting with the CAT Chair, who may change the requirement to individual counseling or an assessment by an outside agency.

- d. Students who fail to comply with the assessment requirement and/or to complete the assessments/groups will also be referred to the College's student conduct system and may be separated from the institution.
3. Meeting: At such time as the CAT has received sufficient information to take action, the CAT will meet to determine the level of risk that the behavior / situation poses to the student and to others. The CAT will also determine the College's response. The CAT may, but is not required to, use the Threat Assessment Checklist (Annex B) to determine a Level of Risk (Annex C), and an appropriate Intervention Strategy (Annex D). The CAT may also use any other threat assessment models appropriate to the situation, however, and adopt any Intervention Strategy it deems responsive. In most cases, students are willing to work with the college and obtain the assistance necessary to complete their educational program. In those cases in which a student is not willing to cooperate with the CAT's intervention strategy, the CAT may initiate an Involuntary Withdrawal, pursuant to Memorandum 2-21.
 4. Follow-up and Monitoring: In addition to any of the specific strategies above, the CAT will determine a plan for follow-up monitoring of each student.
 - a. Any departments, faculty, and staff determined to have a "need to know" will be notified by the Associate Provost, the Director of the Counseling Center, or a designee of either.
 - b. If it is determined by the Director of the Counseling Center, The Citadel Surgeon, or another mental health professional that a student is at risk of harm to self or others, that official may contact the family or guardian, as appropriate, though in coordination with the Provost.
 5. In all cases, the Provost, Associate Provost for Academic Affairs, or the Director of the Counseling Center, or their designees, will notify the student in writing as soon as is reasonably possible regarding their decisions and inform the student of any conditions of their continued enrollment or re-enrollment. The student will be given an opportunity to speak with a counselor or mental health professional as soon as reasonably possible.
- I. Appeal: Should a student wish to appeal a decision of the CAT, the appeal must be made in writing to the President within five (5) business days of the receipt of the decision. The decision of the President is the college's final decision.
 - J. Confidentiality:
 1. If a student referred to the CAT is already receiving care at the Counseling Center or an outside mental health provider, information about that student's relationship may not be obtained by the team from those agencies without written authorization from the student.

2. Notes and meeting records taken by CAT members are for personal use only, and shall be maintained by CAT members in a confidential file.
3. CAT members may provide each other or faculty/staff involved in a particular case, or outside parties in connection with the situation (such as parents/guardian), with information in situations that concern protecting the health and safety of that student or others in the community.
4. The Citadel has a duty to warn members of the community when potential harmful or dangerous situations have been reported and after review by the CAT warrant such notification. In these situations, CAT may breach confidentiality in order to warn potential victims.

5. COMPLIANCE:

Individuals having knowledge of threats or violent acts who fail to report that information to appropriate disciplinary authorities and/or the Campus Assessment Team may be subject to discipline, up to and including separation from The Citadel. Students who fail to comply with a request for assessment and/or conditions of continued enrollment may be referred to the Commandant or Provost, as appropriate, and may be summarily removed from The Citadel.

A student seeking readmission who has been withdrawn pursuant to this policy must reapply, and provide competent evidence that the medical/psychological condition no longer exists, is sufficiently under treatment so as to remove any substantial likelihood of reoccurrence, or that the student is no longer a direct threat.

6. NOTES:

A. Dates of official enactment and amendments:

Approved by Director of Citadel Staff on (Day) (Month) (Year)

Non-substantive changes made on 29 November 2016: Changed "Dean of the Citadel Graduate College" in para 4, sub-para B, sub-para 2, sub-para d.

B. Responsible Department:

Provost

C. Responsible Official:

Director of the Counseling Center

D. Cross References

Involuntary Withdrawal Policy

7. RESCISSION:

None

8. REVIEW

Annual or biennial.

FOR THE PRESIDENT:

OFFICIAL

JOSEPH W. TREZ

Colonel, US Army, Retired

Director of The Citadel Staff

Attachment

Annex A, Campus Assessment Team Incident Report

Annex B, Behavior/Threat Assessment Checklist

Annex C, Levels of Risk

Annex D, Intervention Strategies

Annex A

Campus Assessment Team Incident Report

This Behavioral Incident Report is designed to enable faculty, staff and students to voluntarily report “red flag behaviors” that may raise concerns and incidents of student misconduct at The Citadel. An incident, in this context, is an event that does not warrant immediate intervention. **In the event of an emergency that requires immediate intervention, call 911.** The Behavioral Incident Report will provide a mechanism for responding to individual incidents and will reveal patterns of disruptive behavior of specific students. It will also provide aggregate data on the nature and frequency of disruptions at The Citadel. This report provides a standardized method for recording observations of troublesome behaviors and for alerting staff of potential concerns.

Student information: (please enter as much information as possible)

Name _____

Student ID # _____

Address _____

Phone _____

Incident Information:

Date of incident _____ Date form completed _____

Class/Location of incident _____ Time of incident (approximate) _____

Name of person reporting incident _____

Phone _____

Email address _____

Are you a _____ student _____ employee _____ other (please explain)

Name(s) of others involved _____

Please provide a detailed description of the incident, paying particular attention to the behaviors of the student.

Concrete, specific observations are most useful. Avoid providing judgments, assessments and opinions:

Please describe conversations you have had with the student and any action you have taken regarding this incident:

Please submit completed form to the Office of the Dean of Students. Individuals are allowed to make anonymous reports, however if a name is not provided it may hamper the team's ability to seek follow up information that may be critical in determining an appropriate course of action. If a name is provided the team will provide feedback regarding actions taken

Emergency Contact Numbers

Emergency:	Dial 911
Citadel Public Safety:	(843) 953-5114 (811 from campus phone)
Citadel Counseling Center:	(843)-953-6799
Citadel Infirmary:	(843)-953-6847

Annex B

Behavior/Threat Assessment Checklist

This checklist is designed to be used by The Citadel's Campus Assessment Team in assessing risks for potential violence by a student who has made a threat (verbally or in writing) or whose actions are suspicious enough that a reasonable person might believe that the student may be prone to violence. This checklist will be used in conjunction with other assessment and intervention tools.

Student Last Name	First	Middle Initial	Student ID or Birth date
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Observed or known behaviors:

- has access to weapons
- appears to have fascination with weapons or explosives
- is knowledgeable about or has used weapons
- has history of bringing weapon to school
- has made recent threats to act out violently
- has provided evidence of making plans to act out violently, named a specific target for violence
- history of arrests/convictions for violent acts
- identifies contingencies that would provoke an act
- is brooding over an event in which he/she was perceived to be unfairly treated
- expresses unreasonable feelings of being persecuted by others
- has experienced a recent life stressor or event
- appears to be a loner and reveals having no close friends
- has a history of being bullied or teased
- does not show concern for legal or personal consequences
- appears to lack appropriate empathy or remorse
- has threatening and/or loud speech, disorganized speech
- is observed as maintaining prolonged stares
- is observed with signs of agitation (pacing, clenched fists, etc.)

- reveals feelings of depression, hopelessness, despair
- refuses to communicate
- known to abuse alcohol or to use illicit drugs
- constantly blames others and refuses to take responsibility
- identifies with offenders, praises other school violence events
- engaged in property damage
- other students/staff/faculty are afraid of this student
- says they have no options or there is no way out for them
- appears suicidal
- prior suicide attempts and self infliction of injuries
- history of obsessively following or stalking others
- has thought insertion, someone putting thoughts into their head
- auditory, command, or visual hallucinations
- diminished self care (dirty, disheveled, poor hygiene)
- psychiatric disorder diagnosis
- gang membership

Behavioral Intervention Team Assessment:

- High Risk
- Moderate Risk
- Low Risk

Chair, Campus Assessment Team

Date

Annex C

Levels of Risk

Levels of Risk: Based on all data gathered, the CAT may use the following scale to determine the level of risk that the behavior/situation poses to the student and to others.

1. Mild Risk
 - a. Disruptive or concerning behavior
 - b. Student may or may not show signs of distress
 - c. No serious threat to the student or others
2. Moderate Risk
 - a. More involved or repeated disruption – likely distressed or low-level disturbance
 - b. Possible threat to self or others but unlikely to substantiate
 - c. Threat is vague and indirect
 - d. Information about threat or threat itself is inconsistent, implausible or lacks detail
 - e. Threat lacks realism
 - f. Content of threat suggests threatener is unlikely to carry it out
3. Elevated Risk
 - a. Seriously disruptive incident(s)
 - b. Exhibiting clear distress, more likely disturbance
 - c. Threat made or present
 - d. Threat is vague and indirect, but may be repeated or shared with multiple reporters
 - e. Information about threat or threat itself is inconsistent, implausible or lacks detail
 - f. Threat lacks realism, or is repeated with variations
 - g. Content of threat suggests threatener is unlikely to carry it out
4. Severe Risk
 - a. Disturbed or advancing to dysregulation
 - b. Threat made or present
 - c. Threat is vague but direct, or specific but indirect (type of threat v. object of threat)
 - d. Likely to be repeated or shared with multiple reporters
 - e. Information about threat or threat itself is consistent, plausible or includes increasing detail of a plan (i.e., time, place)
 - f. Threat likely to be repeated with consistency (may try to convince listener they are serious)
 - g. Content of threat suggests threatener may carry it out

5. Extreme Risk
 - a. Student is dysregulated (way off their baseline) or medically disabled
 - b. Threat made or present
 - c. Threat is concrete (specific and direct)
 - d. Likely to be repeated or shared with multiple reporters
 - e. Information about threat or threat itself is consistent, plausible or includes specific detail of a plan (i.e., time, place), often with steps already taken
 - f. Threat likely to be repeated with consistency
 - g. Content of threat suggests threatener will carry it out (reference to weapons, means, target)
 - h. Threatener may appear detached

Annex D

Intervention Strategies

- A. **BEHAVIORAL OR TREATMENT PLAN:** The Citadel may require that the student meet certain conditions regarding the student's behavior over a specified period of time if he/she is to remain enrolled. Conditions could include availing him or herself of supportive services or accommodation arrangements. Such agreement shall be made only in mild or moderate risk situations and not with any student whose behaviors indicate harm or danger to themselves or any member of the community.

- B. **REFERRAL TO CITADEL AND/OR COMMUNITY RESOURCES:** The CAT may refer the student to the counseling center for intervention and connection with appropriate mental health professionals. CAT may also require a student to engage in a cooperative, committed relationship with a counselor, the counseling center, or with an appropriate outside counseling or psychiatric agency before continuing as a student. Additionally, The Citadel may stipulate that a student provide information from an outside counselor, counseling agency, or psychiatrist indicating the student's ability to continue at The Citadel.

- C. **VOLUNTARY WITHDRAWAL:** Based on discussion with a counselor or member of the CAT, the student may initiate withdrawal from The Citadel for medical or psychological reasons demonstrated to the satisfaction of the President. At the discretion of the President, arrangements can be made for tuition refund or crediting, incomplete grades or other academic accommodations to aid in the transition of the student to resources better able to support their mental and/or psychological needs.
 - 1) The withdrawal agreement will specify the reasons for withdrawal, and place a hold on the student's registration status until the student is eligible for reinstatement.
 - 2) The agreement will specify the period for withdrawal and detail any conditions necessary for reinstatement.

- D. **INVOLUNTARY WITHDRAWAL:** In extreme risk situations, the CAT may find it necessary to recommend to the President an immediate removal from The Citadel for a student who is unable or unwilling to comply with the requests of the CAT or agree to a voluntary withdrawal.

Separation from the College, to include expulsion, may result where there is disruptive or threatening behavior that is assaultive, suicidal, self-injurious or self-neglectful and which poses a substantial danger of causing imminent harm to the student, to others, or to substantial property rights, or which renders the student unable to engage in basic required activities of cadets, or that substantially impedes the lawful activities of others.

- 1) An interim suspension may be imposed prior to a suspension/expulsion hearing to allow time for a behavioral mental health assessment or evaluation with a counselor, the counseling center, or with an appropriate outside counseling or psychiatric agency before continuing as a student at The Citadel.

E. **CRIMINAL CHARGES:** Students who have engaged in behavior that may be a violation of local, state, or federal law may be referred for criminal prosecution. The Chief of Police will ensure a comprehensive investigation is conducted and determine whether probable cause exists for the filing of criminal charges.