

BETHEL COLLEGE

TITLE IX

Threat Assessment Policy

I. PREAMBLE

Bethel College is committed to providing the best possible education for all its students and a good working environment for all its employees. In striving to achieve this goal, it is important to ensure the physical and emotional safety for all students, faculty, and staff.

A threat assessment is a tool the College may use when facing an extraordinary discipline and safety issue. A threat assessment is a way to assess a student's particular physical, emotional, and psychological well-being and help that student receive the assistance needed in order to continue being a productive member of the campus community. The primary goal of the threat assessment process at Bethel is to provide early assistance to students in distress in order to ensure well-being and safety and help prevent situations of concern either before or after a conduct violation has occurred, from becoming more serious.

A student is defined as any person applying to the College or currently enrolled in any course on campus or online, including students applying (or re-applying) to Bethel programs or currently enrolled in Bethel coursework.

A threat is defined as any conduct that presents a clear and present danger to self, others, or the campus community in general. In immediate or serious threatening situations, the President or his/ her designee reserves the right to waive the assessment process outlined in this document and act in the best interest of campus safety, subject to the provisions of Section II.B.

While some threat assessment resolutions may result in disciplinary action against the student, it is the sincere hope that through the threat assessment process, resources and assistance can be provided to the student in such a way that the student can continue to receive a quality education and Bethel can continue to be a friendly, safe environment for students and staff.

II. CONVENING THE THREAT ASSESSMENT TEAM

A. Discretionary Review

Faculty, staff, and students may contact any member of the Threat Assessment Team at any time to report observations of unusual student behavior, regardless of whether or not a Community Standards violation has occurred.

The first official point of contact will be the vice president for student life if any situation presents imminent and serious danger.

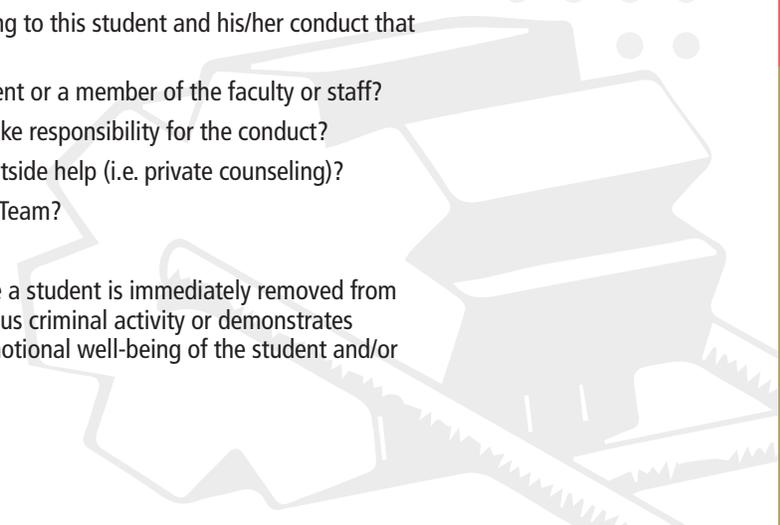
Upon receiving a report, the vice president for student life will immediately conduct a preliminary investigation to determine if the report needs to be reviewed by the Threat Assessment Team. A preliminary investigation will include, but is not limited to contacting faculty and staff who know the student, and, if deemed appropriate and necessary, meeting~ with the student. Should the student refuse to meet, and if it is determined by the Threat Assessment Team as reasonably necessary to conduct and conclude its preliminary investigation and to address immediate safety concerns, the student may be immediately removed from campus.

The President and/or vice president for student life has the discretion to call for a Team review when facing an extraordinary discipline and/or safety issue. In addition to results of the preliminary investigation, objective evidence and/or current medical knowledge, other factors the VPSL should consider, including, but are not limited to, the following:

- Is this student possibly a direct threat to the health, safety, or welfare of himself and/or others? Why?
- Could this student benefit from additional psychological, physical, and emotional services? How?
- Does this student have a past history of disciplinary problems?
- Are there any unresolved legal issues or allegations, pertaining to this student and his/her conduct that could negatively impact any persons on the Bethel campus?
- Does the allegation include an altercation with another student or a member of the faculty or staff?
- Has the student already taken some action to apologize or take responsibility for the conduct?
- Has the student sought or is the student currently seeking outside help (i.e. private counseling)?
- Given the situation, is there adequate time for review by the Team?

B. Mandatory Review

The vice president for student life must convene the Team any time a student is immediately removed from campus. Such action is required when the student engages in serious criminal activity or demonstrates behavior that constitutes a direct threat to the health, safety or emotional well-being of the student and/or



other students, faculty, and staff. In such cases, the VPSL will immediately suspend the student and remove him or her from campus for no more than ten school days pending a due process hearing.

III. COMPOSITION OF THE THREAT ASSESSMENT TEAM

The Threat Assessment Team membership may consist of the following or their designees:

| POSITION | RATIONALE |
|-------------------------------------|---|
| Vice president for student life | Responsible for campus safety, student code of conduct, overall safety of the campus community and providing student development services |
| Vice President for academic affairs | Responsible for academic programs and student instruction |
| Resident director (TBD by VPSL) | Holds evening hours and can respond to emergencies during that time |
| Vice president for communications | Responsible for public relations |
| Mental health counselor (TBD) | Responsible for providing mental health services for students |

The vice president for student life, at his/her discretion, may include additional staff or faculty with expertise in dealing with the perceived threat to the Team as needed. If a conflict of interest occurs or the appearance of a conflict of interest arises for any of the Team members, the VPSL shall appoint a substitute for that individual.

IV. NOTIFICATION TO THE THREAT ASSESSMENT TEAM AND STUDENT

After the vice president for student life (in consultation with selected residence life staff) reviews a situation and decides that it warrants a review by the Team, it shall be the VPSL's responsibility to assemble the Team in accordance with the provisions of Section II. If the situation involves a Community Standards violation, the VPSL will make a reasonable effort to provide timely written notification of the charges to the student that includes requirements for cooperation with the investigation, and the Team's investigation will serve as due process. Notification may be delivered by hand or through standard mail to the student. In the absence of a conduct violation, written notification to the student explaining that a Team has been assembled to evaluate the situation will be at the discretion of the Team.

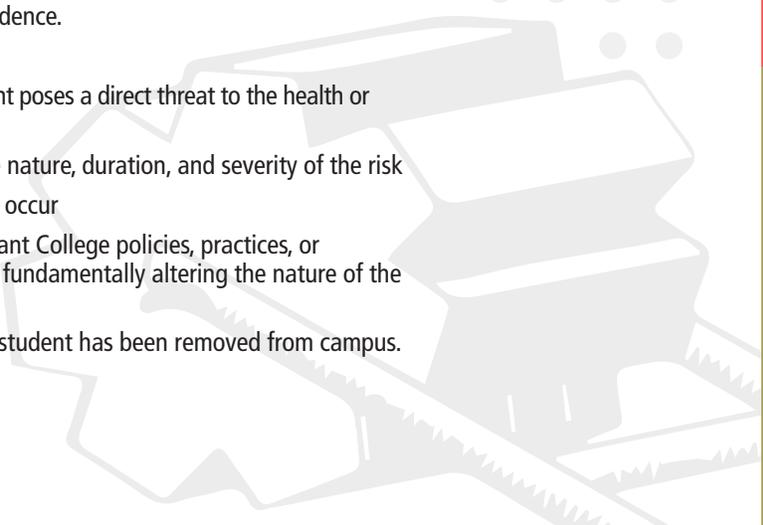
The VPSL shall provide the Team with a written report that includes:

- A full account (includes all relevant evidence) of the alleged concern or Community Standards violation.
- Factors for justifying a review by the Team.
- Any additional relevant information that would be useful to the Team to assist in their assessment.

V. ROLE OF THE THREAT ASSESSMENT TEAM

The role of the Team is to assist students in distress and help prevent situations of safety concern, either before or after a conduct violation has occurred, from becoming more serious. Specifically, the Team will

- Review the alleged safety concern or Community Standards violation
- Evaluate the student's behavior in light of the accumulated evidence.
- Provide appropriate recommendations to the President.
- Conduct an individualized assessment of whether or not a student poses a direct threat to the health or safety of others
- The individualized assessment will include consideration of the nature, duration, and severity of the risk
- Determine the probability that the potential injury will actually occur
- Consider whether or not reasonable modifications of any relevant College policies, practices, or procedures will mitigate the risk posed by the student without fundamentally altering the nature of the service, program or activity
- Complete the assessment within three (3) business days if the student has been removed from campus.



At its discretion, the Team will have full investigatory authority when reviewing the alleged concern or conduct violation and evaluating the student's behavior. If a conduct violation has occurred, the investigation serves as the student's due process. The Team has the right to:

- Interview the student.
- Interview all relevant witnesses.
- Interview any individual that the Team deems helpful in providing a proper assessment.
- If applicable, interview the accuser(s).
- Inspect any of the student's school records. Note: The Team has a legitimate educational interest in the student's school records.
- Request the student to release medical records to the College.
- Request information from prior colleges the student has attended.
- If deemed necessary to the investigation, request the student to sign a waiver allowing elementary and secondary school records to be released to the College.

Nothing herein prevents the President and the Team from segregating multiple violations of the student Community Standards and/or reported concerns and proceeding with an investigation on violations/concerns that may be related to any alleged threatening behavior. For example, the Team may proceed with an investigation regarding alleged sexual harassment while analyzing other threatening behavior exhibited by the student.

VI. STUDENT COOPERATION WITH THE THREAT ASSESSMENT TEAM'S INVESTIGATION

The student shall fully cooperate with the Team and their investigation. A student's failure to cooperate with the Team in any way shall be considered by the Team and will be reflected in the Team's recommendation to the President. Requirements for cooperation and consequences for failure to cooperate shall be stated in written communication to the student.

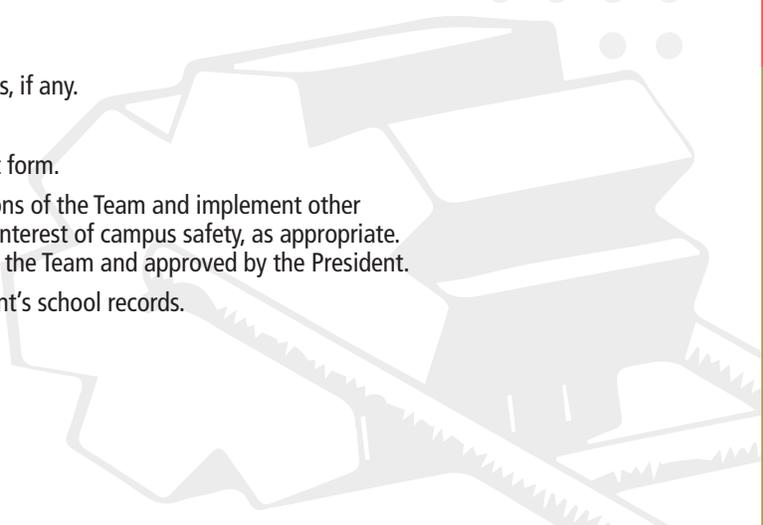
VII. RECOMMENDATIONS BY THE THREAT ASSESSMENT TEAM

Once the Team has concluded their investigation, the Team will issue a written recommendation report to the President (or if time is of the essence, the Team's verbal recommendations shall be reduced to writing as soon as practicable). These recommendations may include:

- An opinion as to whether or not the student may constitute a direct threat to the health, safety, or welfare to himself/herself or others, and if "yes", the vice president for student life will notify law enforcement.
- A suggested Action Plan for the student, if any. An Action Plan may include, but is not limited to one or more of the following:
 - Anger management counseling.
 - Psychological counseling
 - Professional psychological assessment.
 - Waiver from the student allowing the release of the student's school records to local mental health authorities and/or law enforcement.
 - Waiver from the student allowing the release of the student's health records and prior educational records to the College.
 - Scheduled meetings with Student Services staff
 - In the case of a conduct violation, appropriate discipline sanctions, if any.
 - Administrative withdrawal from the College.
 - Hold on the student's application for admission or course request form.

The President reserves the right to disagree with the recommendations of the Team and implement other action consistent with the Community Standards and/or in the best interest of campus safety, as appropriate. In such a case, a revised recommendation report will be prepared by the Team and approved by the President.

A copy of this recommendation report shall be included in the student's school records.



VIII. USE OF THE THREAT ASSESSMENT TEAM'S RECOMMENDATIONS

Once the Team has presented its report to the President and recommendations are finalized, the vice president for student life will provide notice to the student of an opportunity to meet with the Team and explain the Team's recommendations. A meeting with the student shall not be necessary if the Student is not eligible to be admitted to or have access to the College or campus, or if the individual is under arrest, incarcerated, in prison or under court order or other constraint/restraint.

At this meeting, for an alleged safety concern or Community Standards violation, the student will be given:

1. Written notification, of the investigation, findings, recommendations, and if applicable, discipline sanctions and the appeal process. Conditions under which the student may remain in good standing or return to campus and follow-up requirements will also be outlined.
2. If applicable and in accordance with the Team's recommendations, an agreement for signature by the student forgoing the right to a hearing, waiving any right to appeal, and agreeing to the terms and conditions of the Team's recommendations.

In the case of a safety concern absent a conduct violation, if the student does not voluntarily agree to the Team's recommendations, the Team may file the appropriate Community Standards charge and pursue the student discipline process.

IX. REVIEW PERIOD

The Team shall meet at least once per month for one school year to monitor the progress of the student and create a written progress report after each meeting that will be included in the student's school records. If the student has been removed from campus, the student's record will be flagged and efforts will be made, to the best of the Team's ability and according to the availability of information, to monitor the student's progress and/or readiness to return to school. At the end of the one-year review period, the Team will decide if additional monitoring is necessary and for how long. Once additional monitoring is deemed unnecessary, the Team will create a final written progress report and include that report in the student's school records.

If a student agrees to be bound by the recommendations of the Team, and the student violates any of those recommendations, the violation will be treated as a violation of the Student Community Standards, and normal disciplinary procedures will follow.

