

THREAT ASSESSMENT MANUAL

ST. PETERSBURG COLLEGE

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Threat Assessment Procedures

St. Petersburg College has adopted threat assessment procedures developed by the U. S. Department of Education and the U. S. Secret Service in a collaborative effort to help college campuses reduce violence and create safe climates. This threat assessment process is an appraisal of the student's behavior in a given situation, rather than solely on stated threats or individual traits. The assessment focuses on actions, communications and specific circumstances that might suggest that a student poses a threat of targeted violence. Targeted violence is differentiated from other violent acts by the distinct presence of a target or targets. The student who poses a threat intends to mount an attack and is engaged in planning or preparing for that attack.

The Threat Assessment Report will be maintained by the college to provide information regarding a student's previous history of threats.

A flowchart outlining St. Petersburg College's procedures for threat assessment is provided. **The goal will be to complete the process within 24 hours of the report of the threat.** The following provides additional information for campus teams:

1. Student of Concern Identified

Students who become the focus of threat assessment inquiries and investigations may come to the attention of authorities in a number of ways. Some students may be referred to authorities by engaging in actions and communications that cause concern, including threatening letters, e-mails, drawings, statements, or stories written as part of an assignment. Students may also be reported through second or third parties or through anonymous communications.

2. Notify Campus Administrator

An initial point of contact is a campus administrator who will conduct the initial screening and coordinate the threat assessment procedures outlined in the document.

All concerns about a student will be referred to the campus administrator designated as the initial point of contact for the student of concern. The administrator gathers preliminary information related to the concern including statements from the referring individual and from any additional witnesses, as well as copies of written threats or drawings. The Campus Administrator contacts Campus Security. The Campus Administrator completes an Incident Report and Campus Security issues a campus security report.

If the student of concern is a traditional dual enrolled student of a local high school, public or private, or a student in the Early College Program (Clearwater campus), the Campus Administrator may take disciplinary action pursuant to the BOT Rules including a referral for threat assessment, but in any case immediately apprise the Pinellas County School District of the situation. The District may refer the student for assessment and/or other services available through the District or designated high school as appropriate.

If the student is in the Early Admissions Program (high school seniors only), he or she may be eligible for certain services through the Pinellas County School District, but more appropriately assessed as a college student under these procedures. If the student is home schooled and enrolled in college classes he or she may receive certain services through the Pinellas County School District, but more appropriately dealt with under these procedures in consultation with a parent or guardian. In these cases, the Pinellas County School District should be notified of the threat assessment outcome and action taken.

If the student of concern is enrolled at the SPC Collegiate High School, the Principal is notified immediately. In this case, the Principal will work with the Campus Administrator to assess whether a threat assessment is warranted, and may recommend alternative action steps or referrals for appropriate student services. The Pinellas County School District is notified that a threat assessment inquiry has begun. If a threat assessment is deemed warranted, the SPC Collegiate High School Principal shall serve as the Threat Assessment Team Chair.

3. Campus Administrator Determines that the Situation Suggests the Need for Threat Assessment

The Campus Administrator must immediately determine if the concern appears to be potentially credible and serious. Investigation of the concern is not necessary at this point. The decision is based on the administrator's knowledge of the student and the source of the information. This is a preliminary procedure which will be used to screen out those concerns which are easily determined to be neither credible nor serious.

Examples of instances when an administrator would determine that a concern is unfounded include:

- The student is significantly cognitively delayed and often makes statements that exceed their ability to carry out the "threat".
- A source often makes complaints that have no basis for concern, such as "He scared me when he looked at me like that".

The Campus Administrator makes a determination of whether it is appropriate to initiate the Threat Assessment. If so, the Campus Administrator will proceed to determine whether the concern is founded or unfounded.

4. Close as Unfounded/Refer to Student Services as Needed

If the concern appears to be neither credible nor serious, it is determined unfounded. The Campus Administrator completes Part I and Part IV of the Threat Assessment Report and sends the report to General Counsel.

The Campus Administrator considers any appropriate actions in compliance with college policies. The student may be referred to services for additional support and/or be placed into disciplinary proceedings pursuant to the Board of Trustees Rule 6Hx23-4.35.

5. INQUIRY PHASE BEGINS: Notify Campus Security, Provost, Threat Assessment Team, General Counsel and President's office

If the threat appears to be founded, a threat assessment inquiry is immediately initiated. At this stage, the campus Provost, Campus Security, the President's Office and General Counsel's Office are notified that an inquiry is being conducted. However, if the information concerning a threatening situation suggests that a violation of the law has occurred or that violence is imminent – for example, a student with a weapon is on his way to campus and has indicated that he intends to shoot another student – that matter must be referred immediately to police who will proceed with an investigation and crisis response measures as needed.

Please note that the threat may be of a nature that the police chose to defer to campus-based members of the assessment team until after the initial inquiry had been begun by the team. Even if they choose to defer to the team, the police should be notified if concern continues after the first steps of the inquiry.

If the information gathered thus far indicates that more information must be gathered, the college-based threat assessment team is contacted so that individuals on the team can begin immediately with the appropriate interviews as part of the assessment.

The college-based threat assessment team is multidisciplinary and includes representatives of different perspectives and expertise. The threat assessment team will include a representative of the General Counsel's office, as well as a representative of the campus administration which will include the Associate Provost, the Provost, or other designated campus official. The team will also include a member of a college-wide pool of faculty selected for this purpose. Proposed team membership may include other

administrators or security personnel as identified by the Campus Administrator. However, in all cases, the standing team membership shall be approved by the General Counsel's office.

The Campus Administrator (Associate Provost or site Director) or designee will function as the team Chairperson. The Chair will be responsible to assemble the team members, oversee team assignments, facilitate note-taking, and issue the Threat Assessment Report. These responsibilities may be delegated as deemed appropriate by the Chair. If any members are not available, the remaining team members must proceed with the assessment.

Proactive planning is a critical element in the implementation of a college campus threat assessment team, and the college should not wait until a crisis occurs to establish their team.

6. Threat Assessment Team Proceeds with Interviews

It is essential to review college records for current and background information, as well as conduct interviews as follows:

- a. Collateral interviews with students/adults who know or witnessed behaviors of concerns:
 1. What was said? To whom?
 2. What was written? To whom?
 3. What was written? To whom?
 4. What was done?
 5. When and where did this occur?
 6. Who else observed this behavior?
 7. Did the student indicate why he or she acted as they did?

- b. Interview with Student of Concern
 1. This should be conducted by a campus administrator
 2. Prior to the interview
 - a. Be well acquainted with the facts
 - b. Review student records to be familiar with background, behavior and academic performance.
 3. During the interview
 - a. Maintain a professional, neutral and non-confrontational tone
 - b. Ask a student directly about his/her intentions

- c. Convey the message that his/her behavior has been noticed and has caused concern

c. Potential Target Interview

1. The potential target must be informed of the threat. Do not unduly alarm the potential target and offer assistance and support as needed.
2. Inform potential target that the primary purpose of the interview is to gather information about a possible situation of concern
3. Ask about relationship to the student of concern
4. Ask about any recent interactions

7. Meet with Threat Assessment Team

As soon as members of the threat assessment team have conducted their respective interviews, the team needs to analyze the information and examine the evidence for behavior and conditions that suggest the student poses a threat. Presentation and analysis of the information gathered during the threat assessment inquiry should be guided by the following eleven key questions:

a. What are the student's motives and goals?

1. What motivated the student to make the statements or take the actions that caused him or her to come to attention?
2. Does the situation or circumstances that led to these statements or actions still exist?
3. Does the student have a major grievance or grudge?
4. What efforts have been made to resolve the problem and what has been the result? Does the potential attacker feel that any part of the problem is resolved or see any alternatives?

b. Have there been any communications suggesting ideas or intent to attack?

1. What, if anything, has the student communicated to someone else (targets, friends, other students, instructors, family, spouses, employers, others) or written in a diary, journal, or web site concerning his/her ideas and/or thoughts?
2. Have friends been alerted or warned away?

c. Has the subject shown inappropriate interest in any of the following:

1. School/college campus attacks or attackers
2. Weapons (including recent acquisition of any relevant weapon)

3. Incidents of mass violence (terrorism, workplace violence, mass murderers)
- d. Has the student engaged in attack-related behaviors? These behaviors might include:
 1. Developing an attack plan or idea
 2. Making efforts to acquire or practice with weapons
 3. Casing or checking out possible sites and areas for attack
 4. Rehearsing attacks or ambushes
- e. Does the student have the *capacity* to carry out an act of targeted violence?
 1. How organized is the student's thinking and behavior?
 2. Does the student have the means, e.g., access to a weapon, to carry out an attack?
- f. Is the student experiencing hopelessness, desperation, and/or despair?
 1. Is there information to suggest that the student is experiencing desperation and/or despair?
 2. Has the student experienced a recent failure, loss, and/or loss of status?
 3. Is the student known to be having difficulty coping with a stressful event?
 4. Is the student now, or has the student even been suicidal or "accident-prone"?
Has the student engaged in behavior that suggests that he/she has considered ending their life?
- g. Does the student have a trusting relationship with at least one responsible adult?
 1. Does the student have at least one relationship with a person he or she can confide in?
 2. Is the student emotionally connected to – or disconnected from – other students?
 3. Has the student previously come to someone's attention or raised concern in a way that suggested he/she needs intervention or supportive services?
- h. Does the student see violence as an acceptable – or desirable or the only – way to solve problems?
 1. Does the student's environment (friends, fellow students, family, and instructors) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes?
 2. Has the student been "dared" by others to engage in an act of violence?
- i. Is the student's conversation and "story" consistent with his/her actions?

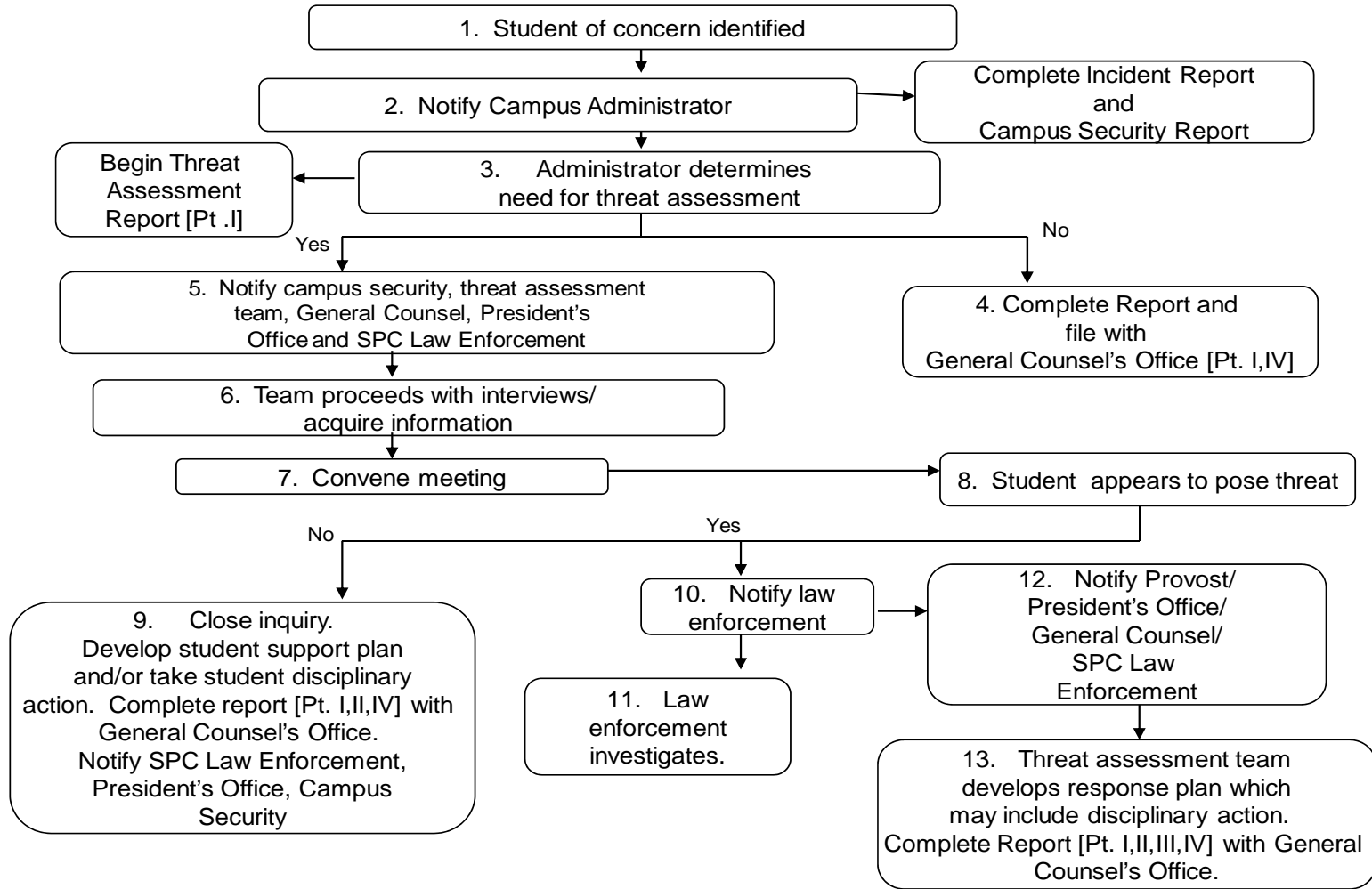
1. Does information from collateral interviews and from the student's own behavior confirm or dispute what the student says is going on?
 - j. Are other people concerned about the student's potential for violence?
 1. Are those who know the student concerned that he/she might take action based on violent ideas or plans?
 2. Are those who know the student concerned about a specific target?
 3. Have those who know the student witnessed recent changes or escalations in mood and behavior?
 - k. What circumstances might affect the likelihood of an attack?
 1. What factors in the student's life and/or environment might increase or decrease the likelihood that the student will attempt to mount an attack at school.
 2. What is the response of other persons who know about the student's ideas or plans to mount an attack? (Do those who know about the student's ideas actively discourage the student from acting violently, encourage the student to attack, deny the possibility of violence, passively collude with an attack, etc?)
- 8. All information will be shared and each question addressed and answered as a team. Through this process the team determines where the student poses a threat of targeted violence. The Threat Assessment Worksheet is to be utilized for this process.**
- 9. If the team determines that the student of concern does not appear to pose a threat of targeted violence:**
- a. The inquiry is closed.
 - b. Parts II and IV of the Threat Assessment Report are completed and filed with General Counsel. The recommended referrals and support services provided, and action steps are taken.

Move to Investigation Phase

Once the team determines that the student of concern does appear to pose a threat of targeted violence, then this process now becomes an **investigation** and law enforcement takes the lead. If campus security has not yet been involved, they must be notified **immediately**.

- 10. If the team determines that the student of concern does appear to pose a threat of targeted violence, the Campus Administrator will notify law enforcement.**
- 11. The law enforcement investigation proceeds.**
- 12. At the same time law enforcement is notified the campus Provost, Campus Security, the President's Office and General Counsel should be briefed.**
- 13. The assessment team will develop or refine a response plan which may include additional referrals to student support services. Disciplinary action may be recommended as appropriate. Complete Part III and Part IV of the Threat Assessment Report.**
- 14. The General Counsel's Office will be responsible to follow-up.**

THREAT ASSESSMENT PROCEDURES



RULE

SUBJECT	THREAT ASSESSMENT	PAGE
		4.351-12
LEGAL AUTHORITY	6Hx23-4.351	11/20/07 Revision #07-11

6Hx23-4.351 THREAT ASSESSMENT

- I. The College has implemented a Threat Assessment procedure based on information provided by the U.S. Department of Education and the U.S. Secret Service in a collaborative effort to help college campuses reduce violence and create safe climates. The Threat Assessment process is an evaluation of the student's behavior in a given situation, rather than solely on stated threats or individual traits. The assessment focuses on actions, communications and specific circumstances that might suggest that a student poses a threat of targeted violence. A Threat Assessment report will be maintained by the College to provide information regarding a student's previous history of threats.
- II. Once a student of concern is identified and comes to the attention of the College administration, the following protocol shall be followed;

- A. A Student of Concern is Identified.

Students who become the focus of threat assessment inquiries and investigations may come to the attention of authorities in a number of ways. Some students may be referred to authorities by engaging in actions and communications that cause concern including, but not limited to, threatening letters, e-mails, drawings, statements, or stories written as part of an assignment. Students may also be reported through second or third parties or through anonymous communications.

- B. The Campus Administrator is Notified.

An initial point of contact is the associate provost or site director, hereinafter referred to as the campus administrator, who will conduct the initial screening and coordinate the Threat Assessment procedures outlined in the document. The campus administrator will contact the General Counsel's Office and campus security upon notification of a possible need for a Threat Assessment.

- C. The Campus Administrator Determines that the Situation Suggests the Need for Threat Assessment.

The campus administrator must immediately determine if the concern appears to be potentially credible and serious. Investigation of the concern is not necessary at this point. The decision is based on the administrator's knowledge of the student and the source of the information. This is a preliminary procedure which

will be used to screen out those concerns which are easily determined to be neither credible nor serious.

D. If the Concern Appears to be Unfounded, a Response Plan is Formulated.

If the concern appears to be neither credible nor serious, the campus administrator completes Part I and Part IV of the Threat Assessment Form and sends the report to the General Counsel's Office. The campus administrator considers any appropriate actions or response in compliance with College policies. The student may be referred to community services for additional support and/or be placed into disciplinary proceedings pursuant to the Board of Trustees' Rule 6Hx23-4.35.

E. If the Concern Appears to be Founded, a Full Threat Assessment is Initiated.

1. If the threat appears to be founded a Threat Assessment inquiry is immediately initiated. At this stage, the campus provost, campus security, President's Office and General Counsel's Office are notified that an inquiry is being conducted. **If the information concerning a threatening situation suggests that a violation of the law has occurred or that violence is imminent the matter must be referred immediately to police who will proceed with an investigation and crisis response measures as needed.**
2. If the information gathered thus far indicates that more information must be gathered, the campus Threat Assessment Team is deployed as soon as possible to begin the assessment process pursuant to the written procedures and guidelines. The campus administrator or designee will function as the team chairperson and be responsible to assemble the team members, oversee team assignments, facilitate note-taking, and issue the Threat Assessment Report.
3. The Threat Assessment Team will analyze information and examine the evidence for behavior and conditions that suggest the student poses a threat using the Threat Assessment Worksheet and investigative guidelines concerning interviews and information sharing.

F. The Team Determines that the Student of Concern Does Not Appear to Pose a Threat of Targeted Violence.

If the team determines that the student of concern does not appear to pose a threat of targeted violence, the Threat Assessment inquiry is closed. Parts II and IV of the Threat Assessment Report are completed and filed with the campus administration, campus security, the President's office and General Counsel's Office. The recommended referrals and support services provided, and action steps are taken.

G. The Team Determines that the Student of Concern Appears to Pose a Threat of Targeted Violence.

1. If it is determined that the student of concern appears to pose a threat of targeted violence, then this process now becomes an investigation and law enforcement takes the lead. The campus administration, campus security, President's Office and General Counsel's Office shall be briefed.
2. The Assessment Team will develop or refine a response plan which may include additional referrals and recommendations regarding student support services and/or disciplinary action as appropriate. The Team completes the Threat Assessment Form with accompanying documentation, and forwards copies of the resulting Threat Assessment Report to the appropriate campus administrators, campus security, and the President's Office. The original Report and file shall be forwarded to the General Counsel's Office, which will be responsible to follow up as appropriate.

Specific Authority:1001.64(2) & (4), F.S.

Law Implemented:1001.64 (4)(a)&(b), 1001.64(8), 1001.65 F.S.

History: Adopted -11/20/07. Effective – 11/20/07.

THREAT ASSESSMENT WORKSHEET

Student _____ **Date:** _____

Campus: AC CL DT EP HC
 MT SE SP TS

Incident: _____

1. What are the student's motive(s) and goals?

- What motivated the student to make the statements or take the actions that caused him or her to come to attention?
- Does the situation or circumstance that led to these statements or actions still exist?
- Does the student have a major grievance or grudge? Against whom?
- What efforts have been made to resolve the problem and what has been the result?
- Does the potential attacker feel that any part of the problem is resolved or see any alternatives?

2. Have there been any communications suggesting ideas or intent to attack?

- What, if anything, has the student communicated to someone else (targets, friends, other students, instructors, family, spouses, employers, others) or written in a diary, journal, or web site concerning his or her ideas and/or intentions?
- Have friends been alerted or “warned away”?

3. Has the subject shown inappropriate interest in any of the following?

- School attacks or attackers
- Weapons (including recent acquisition of any relevant weapon)
- Incidents of mass violence (terrorism, workplace violence, mass murderers).

4. Has the student engaged in attack-related behaviors? These behaviors might include:

- Developing an attack idea or plan
- Making efforts to acquire or practice with weapons
- Causing, or checking out, possible sites and areas for attack
- Rehearsing attacks or ambushes

5. Does the student have the capacity to carry out an act of targeted violence?

- How organized is the student's thinking and behavior?
- Does the student have the means, e.g., access to a weapon to carry out an attack?

6. Is the student experiencing hopelessness, desperation, and/or despair?

- Is there information to suggest that the student is experiencing desperation and/or despair?
- Has the student experienced a recent failure, loss and/or loss of status?

- Is the student known to be having difficulty coping with a stressful event?
- Is the student now, or has the student ever been, suicidal or “accident prone?” Has the student engaged in behavior that suggests that he or she has considered ending their life?

7. Does the student have a trusting relationship with at least one responsible adult?

- Does the student have at least one relationship with a person he or she can confide in?
- Is the student emotionally connected to-or disconnected from-other students?
- Has the student previously come to someone's attention or raised concern in a way that suggested he or she needs intervention or supportive services?

8. Does the student see violence as an acceptable-or desirable-or the only way to solve problems?

- Does the setting around the student (friends, fellow students, family, instructors) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes?
- Has the student been "dared" by others to engage in an act of violence?

9. Is the student's conversation and "story" consistent with his or her actions?

- Does information from collateral interviews and from the student's own behavior confirm or dispute what the student says is going on?

10. Are other people concerned about the student's potential for violence?

- Are those who know the student concerned that he or she might take action based on violent ideas or plans?
- Are those who know the student concerned about a specific target?
- Have those who know the student witnessed recent changes or escalations in mood and behavior?

11. What circumstances might affect the likelihood of an attack?

- What factors in the student's life and/or environment might increase or decrease the likelihood that the student will attempt to mount an attack at school?
- What is the response of other persons who know about the student's ideas or plan to mount an attack? (Do those who know about the student's ideas actively discourage the student from acting violently, encourage the student to attack, deny the possibility of violence, passively collude with an attack, etc.?)

THREAT ASSESSMENT REPORT

Part I

Student's Name _____ I.D. Number _____

SPC Campus AC CL DT EP HC
 MT SE SP TS

Administrator completing report: _____

Date of Incident _____ Time First Reported _____ am pm

Person who reported the issue of concern was _____:

Student Instructor Support staff/Administration

Campus security Law enforcement

Other (explain) _____

Nature of threat or specific threat (exact words if possible; for written threat, attach a copy)

FINDINGS:

UNFOUNDED

It was determined that:

Follow up plan and recommendations:

FOUNDED Proceed to Part II

PART II

Inquiry Initiated

Threat assessment team members who were notified:

_____ at _____ (time) Date: _____
_____ at _____ (time) Date: _____
_____ at _____ (time) Date: _____
_____ at _____ (time) Date: _____

If the student is a minor, was the parent/guardian of the student in question notified of the concern?

- Yes
Mr./Mrs./Ms. _____
Notified on _____ Time _____ am pm
- No
The parent/guardian was not notified because: _____

FINDINGS:

<p><input type="checkbox"/> UNFOUNDED</p> <p>Although the student's actions caused concern, it was determined that the student was not capable of carrying out the threat because:</p> <p>_____</p> <p>_____</p> <p>Follow up plan and recommendations:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Complete Part IV</p>
<p><input type="checkbox"/> FOUNDED Proceed to Part III</p>

PART III

Investigation

A review of the events and an analysis of the available information resulted in law enforcement initiating a criminal investigation by _____

(Officer/Deputy's Name) on _____ and:

- A criminal charge for _____ was made (attached copy of Police Report and Charging Document)
- A criminal charge was not made

Proceed to Part IV, complete Narrative and sign.

Signatures of Threat Assessment Team

Date

Date

Date

Date

Date

Date

Date