



D. STAFFORD
& ASSOCIATES

Title IX Coordinator- Safety and Risk Analysis (Tier 3)

Presented by DSA Associates:

Cathy Cocks

Adrienne Murray

Ann Todd

D. Stafford & Associates, LLC
179 Rehoboth Avenue, #1121
Rehoboth Beach, DE 19971
302-344-5809

Dolores@DStaffordandAssociates.com
www.dstaffordandassociates.com

©All rights reserved by DSA

(Limited permission is granted to each attendee of this class to make training materials available per the requirements outlined in the Title IX Regulations published on May 19, 2020)



D. STAFFORD
& ASSOCIATES

Safety & Risk Analyses Training

- **Introduction**
- **Regulations, Guidance, & Case Law**
- **The Analysis**
- **Logistics**
- **The Challenge**



Adrienne Meador Murray, Vice President,
Equity Compliance and Civil Rights Services



In January 2014, Adrienne Meador Murray joined D. Stafford & Associates where she currently serves as the Vice President, Equity Compliance and Civil Rights Services after having been affiliated with D. Stafford & Associates as a part-time Associate since 2012 and the National Association of Clery Compliance Officers & Professionals (NACCOP) where she currently serves as Director of Training and Compliance Activities. Murray began her career in municipal law enforcement as a civilian employee with the City of Richmond Police Department (Virginia). She graduated from the Virginia Commonwealth University Police Training Academy and began her career as a sworn police officer for the University of Richmond (UR) Police Department (Virginia). At UR, Murray progressed through the ranks from a night shift patrol officer to Operations Lieutenant (overseeing criminal investigations, crime prevention and patrol) over the span of a decade before becoming the Chief of Police at Davidson

College in North Carolina. Most recently, Murray served as Chief of Police at Trinity Washington University (in Washington, D.C.).

As the Executive Director, Equity Compliance and Civil Rights Services for DSA, Murray builds on her 17-year career in law enforcement in which she became a nationally recognized expert in the field of best practice postsecondary institutional response to the sexual victimization of college women in the United States and in Canada. She is also a trained civil rights investigator and is well respected throughout the country for her ability to aid institutions in understating how to do best practice criminal and civil rights investigations concurrently. She is well known for her work in having provided support, advocacy and criminal investigative services for victims of sexual assault, stalking and intimate partner violence and is a sought-out speaker and investigator. She has expertise in the construction of best practice law enforcement standard operating procedures and training police officers to respond in best practice and trauma-informed ways to victims of sexual assault and intimate partner violence. In her current role, Murray coordinates curriculum development and instruction for national classes, including basic and advanced sexual misconduct investigation classes; an investigation of dating violence, domestic violence and stalking class; and a Title IX Coordinator/Investigator class offered through D. Stafford & Associates. To date, Murray has trained more than 3,500 criminal and civil rights investigators throughout the U.S.

Drawing on her experiences as a trained criminal and civil rights investigator, Murray also oversees independent investigations of complex sexual misconduct cases; conducts audits of Title IX/VAWA



D. STAFFORD
& ASSOCIATES

P.O. Box 1121
Rehoboth Beach, DE 19971
Phone: (202) 438-5929
dolores@dstaffordandassociates.com

Compliance; drafts institutional sexual misconduct policies and procedures; and conducts campus-based trainings pertaining to the resolution of sexual misconduct offenses on college and university campuses. Murray frequently presents at regional and national conferences on topics such as the *Sexual Victimization of College Women*, *Understanding Consent and Incapacitation*, and *Responding to Sexual Assault on Campus: Clery Act and Title IX Implications*. Murray also conducts provincially specific sexual misconduct trainings throughout Canada.

Murray is a graduate of the University of Richmond, where she received her Bachelor's Degree in Applied Studies in Human Resource Management and of New England College, where she received her Master's Degree in Campus Public Safety Administration. Murray is also a graduate of the 235th session of the prestigious FBI National Academy where she was awarded a graduate certificate in Criminal Justice from the University of Virginia. She has authored numerous journal articles.

Catherine Cocks, M.A.
Consultant, Student Affairs, Title IX, and
Equity Compliance Services



Ms. Cocks has been a higher education professional for over thirty years. Her work with D. Stafford & Associates focuses on Title IX investigations and training; assessment of student affairs policies, practices and services; and behavioral threat assessment. Cathy was the Director of Community Standards for the University of Connecticut for 14 years where she managed the student conduct process, which included managing all Title IX cases involving student respondents and chaired the University's student threat assessment team. Prior to that, she held several positions within Residential Life at the University of Connecticut and Roger Williams University.

She is a faculty member for the Association for Student Conduct Administration's (ASCA) Donald D. Gehring Academy teaching on subjects such as ethics, governance, threat assessment, media relations, and higher education trends. She was an affiliated faculty

member for many years in the University of Connecticut's Higher Education and Student Affairs Master's program teaching "The Law, Ethics, and Decision-Making in Student Affairs."

Cathy has co-authored the "Philosophy of Student Conduct" chapter in the 2nd edition of "Student Conduct Practice" (2020) and was a member of the writing team for CAS Standards' Cross-functional Framework for Identifying and Responding to Behavioral Concerns.

Cathy is a Past President of ASCA. She has also served as a Circuit representative, co-chair of the Public Policy and Legislative Issues Committee, and as a member of the ASCA Expectations of Members Task Force. Cathy has served in a variety of leadership roles in NASPA Region I.

She was the 2015 recipient of ASCA's Donald D. Gehring Award. She is a past recipient of the NASPA Region I Mid-Level Student Affairs Professional Award and the NASPA Region I Continuous Service Award.

She earned her Master's degree in Higher Education Administration from the University of Connecticut and Bachelor's degree in Communications/Media from Fitchburg State University.

Ann Todd
Consultant, Equity Compliance and Civil Rights Investigations



Ann Todd, Esq is a seasoned civil rights investigator in higher education for D. Stafford & Associates (DSA). Ms. Todd is a graduate of Davidson College with a degree in psychology and holds a JD from the University of Nebraska. Prior to joining DSA, she practiced law in Charlotte, NC, specializing in employment and civil rights and worked for a number of non-profit organizations. She returned to her alma mater (Davidson College) in 2008 and worked there through March of 2016 serving as the Assistant Director of Human Resources with the responsibility of managing employee relations and the learning and development function while also serving as the deputy Title IX Coordinator.

Ms. Todd joined the DSA in 2015 and currently serves as the Consultant, Equity Compliance and Civil Rights Investigations. She is the Senior Investigator for the DSA Title IX Investigation Team. She conducts external investigations on behalf of colleges and universities, specializing in investigating student allegations of sex discrimination, sexual assault, intimate partner violence, and stalking. Additionally, she brings a strong Human Resources background to investigating a range of employee misconduct—from performance issues to discrimination.

In addition to conducting investigations, Ms. Todd is a frequent speaker and consultant on Title IX investigations, conducting 20-30 courses every year on best practices for investigating sex discrimination and sex crimes on campus. She works with schools to draft policies and processes that provide equity and fairness to



179 Rehoboth Avenue, #1121
Rehoboth Beach, DE 19971
Phone: (202) 438-5929
dolores@dstaffordandassociates.com

all parties involved and is adept at facilitating discussions with institutions to ensure the end product represents the values of the campus community.

Ms. Todd is licensed private investigator and a member of the NC Bar. She is a Certified Clery Compliance Officer through the National Association of Clery Compliance Officers and Professionals (NACCOP) and she is also a certified 360 facilitator through the Center for Creative Leadership. Ms. Todd lives in Davidson, NC where she volunteers on a number of local and town boards.

INVESTIGATION CLASS ACRONYMS

- ASR:** Annual Security Report (often used as a reference to the Annual Security Report and/or the Annual Security and Fire Safety Report) that must be published by each institution of higher education.
- CSA:** Campus Security Authority—Individuals on each campus who have been identified by the Department of Education as persons who are required to report crimes that they become aware of to the Reporting Structure at each institution.
- DCL:** Dear Colleague Letter—this is a formal name of the method of communication from the Department of Education to college campuses. It is like naming their official “memo” to campuses.
- FERPA:** Family Educational Rights and Privacy Act—governs the confidentiality of student records.
- FNE:** Forensic Nurse Examiners
- GO:** General Order—some departments describe their operating procedures as general orders
- HEOA:** Higher Education Opportunity Act—the broader law that contains the Clery Act language and the fire safety and missing person language that is in the law but not contained within the “Clery Act” portion of the law.
- HIPAA:** Health Insurance and Privacy and Portability Act—governs privacy of medical records.
- MOU:** Memorandum of Understanding—an official agreement developed between agencies.
- NIBRS:** National Incident-Based Reporting System. 1 of 2 crime reporting systems developed by the FBI, but not the system that you are required to use for Clery Reporting—the only portion of this system that is used for Clery Act purposes are the 4 forcible and 2 non-forcible sex offense definitions.
- OCR:** Office of Civil Rights—the unit of the Department of Education that oversees Title IX Compliance.
- PD:** Police Department
- PS:** Public Safety
- PNG:** Persona-non-Grata—process used by some campuses not keep students from entering certain areas of the campus or the entire campus (administrative process) versus legal bar notice or trespass warning.
- SACC:** Sexual Assault Crisis Center, also known as Women’s Center.
- SANE:** Sexual Assault Nurse Examiner

SART: Sexual Assault Response Team

SOP: Standard Operating Procedures—some departments describe their operating procedures as Standard Operating Procedures. Some call them General Orders, etc...

SWA: Senior Women's Administrator (Athletics)

TWN: Timely Warning Notice

UCR: Uniformed Crime Report. This is 1 of 2 crime statistics reporting systems developed by the FBI. Institutions are required to use UCR Standards for counting and classifying crimes for reporting the Clery statistics.

VAWA: Violence Against Women Act



TITLE IX

Copyright

(Limited permission is granted to each attendee of this class to make training materials available per the requirements outlined in the Title IX Regulations published on May 19, 2020)

These materials are copyright of D. Stafford & Associates, LLC © 2023 D. STAFFORD & ASSOCIATES. All rights reserved.

Any distribution or reproduction of part or all of the contents in any form is prohibited other than the following:

- As required by 34 C.F.R. § 106.45(b)(1)(iii) and § 106.45(B)(10)(i)(D), this material in its entirety may be posted to the website of the institution in which you were associated with at the time in which you were enrolled in this training.*
- Public inspection upon request.*

You may not, except with our express written permission, distribute or commercially exploit the content. Nor may you transmit it or store it in any other website or other form of electronic retrieval system.

ISSUANCE OF CERTIFICATES FOR COMPLETION

To receive a certificate, attendees must attend the majority of the class and have paid class invoice in full. This applies to both in-person classes and virtual classes. We understand that attendees may need to miss class for a legitimate reason for longer periods of time or may need to leave the room during a class for a few minutes to take a phone call or attend to other business. If an attendee misses a significant amount of the class (depending on the length of the class) or they miss an attendance poll, they will not be issued a certificate of completion for the class.

Attendees should report each absence using the online form provided (each class has its own unique form that is sent to all attendees via email prior to class). Attendees should complete the form twice for each absence: once to record their departure, and again to record their return. Attendees should complete the form immediately before leaving class and as soon as practicable upon their return. If an attendee signs out but does not sign back in, they will be marked absent for the remainder of the day.

The criteria for receiving a certificate is determined based on missed class time and participation in the Attendance Polls that will be launched throughout each day of class. Attendance polls are left up for approximately 5 minutes and the instructor notifies the attendees that a poll is being launched to ensure that everyone who is present can respond to the poll. If an attendee is unable to respond to the attendance poll, the attendee would need to **immediately post "I am here"** in the chat feature within the Zoom platform. That way we can give the attendee credit for being in attendance for that specific poll. Notifying us after the attendance poll has been closed will not allow us to give the attendee credit for being in class during the poll.

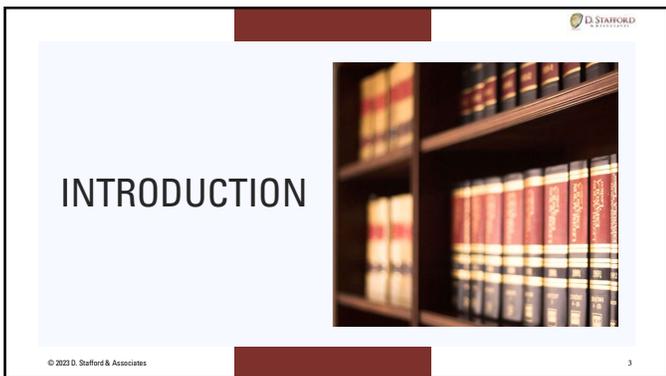
Some of our classes may qualify for credit toward a Master's Degree at New England College (and regardless if you decide to seek credit or not, accreditation requirements mandate that we follow the same standards for all class attendees), so we have strict attendance standards that we follow for issuance of a certificate. For DSA & NACCOP, issuance of a Certificate of Completion is verification of attendance.



1



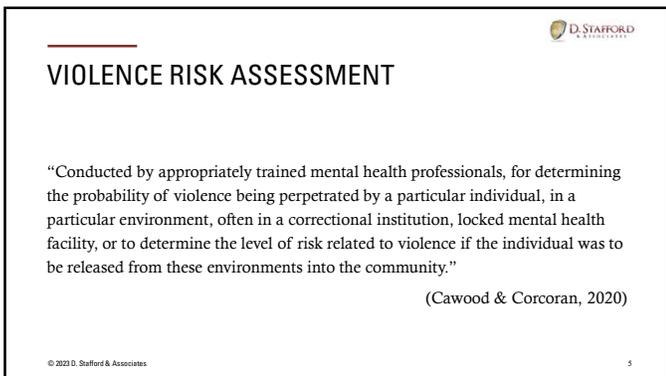
2



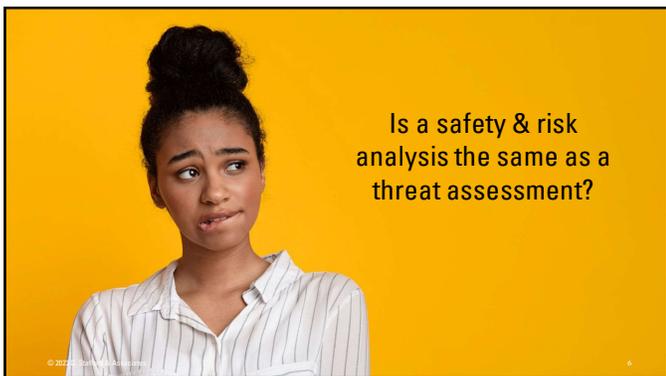
3



4



5



6

THREAT ASSESSMENT

“A systematic, fact-based method of investigation and examination that blends the collection and analysis of multiple sources of information with published research and practitioner experience, focusing on an individual’s patterns of thinking and behavior to determine whether, and to what extent, a Subject is moving toward an attack. A threat assessment is not a final product, but the beginning of the management process. It guides a course of action to mitigate a threat of potential violence; merely identifying that someone is of moderate or higher concern, without developing a management strategy, does not complete this process and is not recommended.”

(FBI, 2017)

7

THREAT ASSESSMENT TEAMS

What they are:

- Multidisciplinary teams
- Non-adversarial community engagement
- Holistic approach
- Proactive and integrated case management

What they should not be:

- Discipline processes
- Conduct/hearing officers (Title IX or otherwise)
- Determiners of emergency removals/interim actions

8

OCR TO ST. JOSEPH’S COLLEGE (NY) - JANUARY 21, 2011

“Based on the above, OCR determined that the College treated the Student differently, because of her perceived disability, regarding her suspension from the College. Specifically, OCR determined that the College utilized the BAC process to suspend the Student because College staff perceived her behavior as symptomatic of a mental health condition. OCR further determined that the College has only used the BAC process, in situations where it perceives that a student’s behavior are the result of a mental health condition (even if undiagnosed). OCR determined that the College has used the ‘emergency suspension’ process, which includes an SJC hearing, only when a student’s behaviors do not appear to be the result of a mental health condition. OCR determined that the BAC process did not provide the Student with any of the due process rights set forth in guidelines for ‘emergency suspension,’ including an ‘opportunity for denial and/or explanation’ and did not afford the Student the opportunity for a hearing before the SJC. On each occasion that the BAC convened, the College failed to afford the Student the opportunity to present evidence or witnesses on her behalf, and also failed to provide the Student with information about any method by which she could appeal the BAC’s determination.”

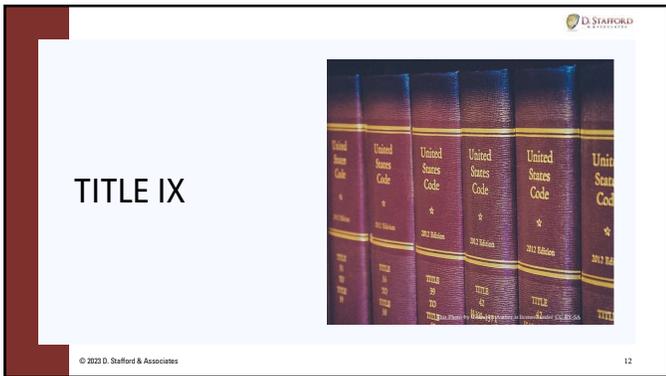
9



10



11



12

34 CFR 106.44(c) EMERGENCY REMOVAL

Nothing in this part precludes a recipient from removing a respondent from the recipient's education program or activity on an emergency basis, provided that the recipient undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. This provision may not be construed to modify any rights under the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, or the Americans with Disabilities Act.

13

34 CFR 106.44(h) EMERGENCY REMOVAL

Nothing in this part precludes a recipient from removing a respondent from the recipient's education program or activity on an emergency basis, provided that the recipient undertakes an individualized safety and risk analysis, determines that an immediate and serious threat to the health or safety of students, employees, or other persons arising from the allegations of sex discrimination justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. This provision must not be construed to modify any rights under the Individuals with Disabilities Education Act, 20 U.S.C. 1400 et seq., Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794, or Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. 12131–12134.

14

KEY TAKEAWAYS FROM THE 2020 PREAMBLE



15



NOT A BACKDOOR

“... is not a substitute for reaching a determination as to a respondent’s responsibility for the sexual harassment allegations; rather, emergency removal is for the purpose of addressing imminent threats posed to any person’s physical health or safety, which might arise out of the sexual harassment allegations.” (85 FR 30224)

16



YOU DO YOU

“... the recipient should have discretion to determine the appropriate scope and conditions of removal of the respondent from the recipient’s education program or activity. Similarly, we decline to require recipients to follow more prescriptive requirements to undertake an emergency removal (such as requiring that the assessment be based on objective evidence, current medical knowledge, or performed by a licensed evaluator).” (85 FR 30224)

17



TOMAYTO, TOMAHTO

“Rather, this provision authorizes a recipient to remove a respondent from the recipient’s education program or activity (whether or not the recipient labels such a removal as an interim suspension or expulsion, or uses any different label to describe the removal) when an individualized safety and risk analysis determines that an imminent threat to the physical health or safety of any person, arising from sexual harassment allegations, justifies removal.” (85 FR 30226)

18



D. STAFFORD
& ASSOCIATES

THE BURDEN

“Changing a respondent’s housing or dining hall assignment may be a permissible supportive measure depending on the circumstances. By contrast, **removing a respondent from the entirety of the recipient’s education programs and activities, or removing a respondent from one or more of the recipient’s education programs or activities (such as removal from a team, club, or extracurricular activity), likely would constitute an unreasonable burden** on the respondent or be deemed disciplinary or punitive, and therefore would not likely qualify as a supportive measure. Until or unless the recipient has followed the § 106.45 grievance process (at which point the recipient may impose any disciplinary sanction or other punitive or adverse consequence of the recipient’s choice), **removals of the respondent from the recipient’s education program or activity need to meet the standards for emergency removals under § 106.44(c).**” (85 FR 30230)

© 2021 D. Stafford & Associates 19

19



D. STAFFORD
& ASSOCIATES

POST-REMOVAL CHALLENGE

“... because § 106.44(c) is intended to give recipients authority to respond quickly to emergencies, and does not substitute for a determination regarding the responsibility of the respondent for the sexual harassment allegations at issue, **recipients need only provide respondents the basic features of due process (notice and opportunity), and may do so after removal rather than before a removal occurs.**” (85 FR 30226)

© 2021 D. Stafford & Associates 20

20



D. STAFFORD
& ASSOCIATES

THREAT TO OTHERS

“... if a respondent threatens physical violence against the complainant in response to the complainant’s allegations that the respondent verbally sexually harassed the complainant, the immediate threat to the complainant’s physical safety posed by the respondent may ‘arise from’ the sexual harassment allegations.” (85 FR 30225)

© 2021 D. Stafford & Associates 21

21



THREAT TO SELF

“...if a respondent reacts to being accused of sexual harassment by threatening physical self-harm, an immediate threat to the respondent’s physical safety may ‘arise from’ the allegations of sexual harassment and could justify an emergency removal.” (85 FR 30225)

22



APPLES & ORANGES

“The Department appreciates commenters’ suggestion to mirror the ‘direct threat’ language utilized in ADA regulations; however, we have instead revised § 106.44(c) to refer to the physical health or safety of ‘any student or other individual’ because this language better aligns this provision with the FERPA health and safety emergency exception, and avoids the confusion caused by the ‘direct threat’ language under ADA regulations because those regulations refer to a ‘direct threat to the health or safety of others’ which does not clearly encompass a threat to the respondent themselves (e.g., where a respondent threatens self-harm). By revising § 106.44(c) to refer to a threat to the physical health or safety ‘of any student or other individual’ this provision does encompass a respondent’s threat of self-harm (when the threat arises from the allegations of sexual harassment), and is aligned with the language used in FERPA’s health or safety exception.” (85 FR 30228)

23

D. STAFFORD & ASSOCIATES

FERPA

© 2023 D. Stafford & Associates

24

24

FERPA HEALTH & SAFETY EXCEPTION

"In making a determination under paragraph (a) of this section, an educational agency or institution may take into account the totality of the circumstances pertaining to a threat to the health or safety of a student or other individuals. If the educational agency or institution determines that there is an **articulable and significant threat to the health or safety of a student or other individuals**, it may disclose information from education records to any person whose knowledge of the information is necessary to protect the health or safety of the student or other individuals. If, based on the information available at the time of the determination, there is a rational basis for the determination, the Department will not substitute its judgment for that of the educational agency or institution in evaluating the circumstances and making its determination." [34 CFR 99.36(c)]

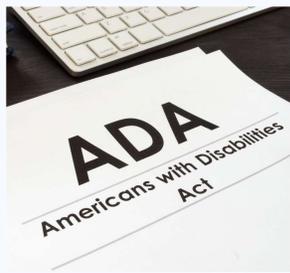
25

FERPA - ARTICULABLE & SIGNIFICANT THREAT

"The phrase 'articulable and significant threat' means that a **school official is able to explain, based on all the information available at the time, what the significant threat is** under § 99.36 when he or she makes and records the disclosure. For instance, if a school official believes that a student poses a significant threat, such as a threat of substantial bodily harm to any person, including to the student, then, under FERPA, the school official may disclose personally identifiable information (PII) from the student's education records without consent to any person whose knowledge of the information will assist in protecting a person from that threat. This is a flexible standard under which school administrators may bring appropriate resources to bear on the situation. If, based on the information available at the time of the determination, there is a rational basis for the educational agency's or institution's decisions about the nature of the emergency and the appropriate parties to whom the information should be disclosed, the Department will not substitute its judgment for that of the school in evaluating the circumstances and making its determination." (FERPA FAQs - Exceptions - Health and Safety Emergency)

26

ADA



27

OCR TO SPRING ARBOR - DECEMBER 16, 2010

“Under Section 504, the ‘direct threat’ standard applies to situations where a university proposes to take adverse action against a student, whose disability poses a significant risk to the health or safety of others. A significant risk constitutes a high probability of substantial harm and not just a slightly increased, speculative, or remote risk. In determining whether a student poses a direct threat, the university must make an individualized assessment, based on a reasonable judgment that relies on current medical knowledge or on the best available objective evidence, to ascertain the nature, duration, and severity of the risk; the probability that the potential injury will actually occur; and whether reasonable modifications of policies, practices, or procedures will sufficiently mitigate the risk. The student must not be subject to adverse action on the basis of unfounded fear, prejudice, and stereotypes.”

28

SPRING ARBOR, CONTINUED

“Under OCR policy, nothing in Section 504 educational institutions from addressing the dangers posed by an individual who represents a ‘direct threat’ to the health and safety of others, even if such an individual is a person with a disability, as that individual may no longer be qualified for a particular educational program or activity under 34 C.F.R. § 104.3(k)(3). Following a proper determination that a student poses a direct threat, an educational institution may require as a precondition to a student’s return that the student provide documentation that the student has taken steps to reduce the previous threat (e.g., followed a treatment plan, submitted periodic reports, granted permission for the institution to talk to the treating professional). However, educational institutions cannot require that a student’s disability-related behavior no longer occur, unless that behavior creates a direct threat that cannot be eliminated through reasonable modifications.”

29

ADA REGULATIONS - 2011

“The term ‘direct threat’ means a significant risk to the health or safety of others that cannot be eliminated by reasonable accommodation.”

30

D. STAFFORD & ASSOCIATES

CASE LAW



© 2023 D. Stafford & Associates 31

31

D. STAFFORD & ASSOCIATES

GOSS V. LOPEZ

“Generally, notice and hearing should precede the student’s removal from school, since the hearing may almost immediately follow the misconduct, but if prior notice and hearing are not feasible, as where the student’s presence endangers persons or property or threatens disruption of the academic process, thus justifying immediate removal from school, the necessary notice and hearing should follow as soon as practicable.”

Goss v. Lopez, 419 U.S. 565, 566 (1975)

© 2023 D. Stafford & Associates 32

32

D. STAFFORD & ASSOCIATES

PICOZZI V. SANDALOW

“In this case, the deprivation was similarly limited. Sandalow neither imposed nor sought formal disciplinary sanctions. Neither did he permanently and finally bar plaintiff’s access to legal education. He simply placed a temporary and preliminary hurdle in Picozzi’s path, *pending the outcome of an administrative hearing*. He made it clear to Picozzi that the University was ready to move ahead with a hearing at his convenience.”

Picozzi v. Sandalow, 623 F. Supp. 1571, 1577 (E.D. Mich. 1986)

© 2023 D. Stafford & Associates 33

33

HILL V. MICHIGAN STATE UNIVERSITY

A riot of several thousand students was a threat to the physical facility, the faculty, and students of MSU. Although the riot was over by the time June suspended Hill on April 16 (as the fire was over before Picozzi sought to re-enroll), June perceived Hill to be a student who, despite being given warnings and being placed on probation, continued his threatening and destructive behavior. Thus, Hill presented himself as a law to himself — a destructive person. Furthermore, the risk of an unwarranted suspension was low given the police evidence of Hill's participation and his disciplinary record at the school. The Court concludes the school's interest in the safety of persons and property and its goal of educating students each hour and each day that school is in session outweigh Hill's interest in being able to live on campus and attend class between April 16 and April 21.

Hill v. Board of Trustees of Michigan State University, 182 F. Supp. 2d 621, (W.D. Mich. 2001)

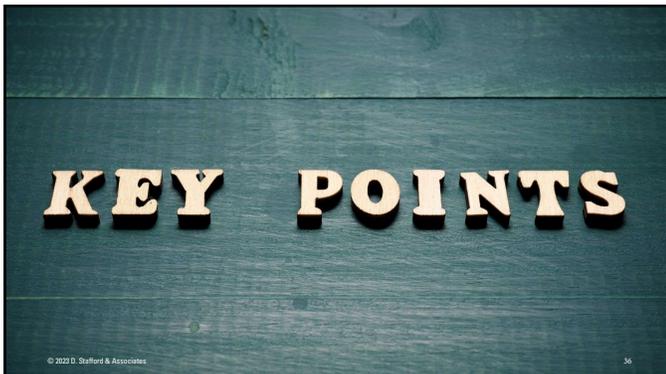
34

HAIKAK V. UMASS AMHERST

“The seven-month delay is a matter of concern. It is true that a university tends, to some extent, to go into ‘sleep mode’ over the summer. But due process is a twelve-month obligation. If the University wishes to avoid a risk of a due process violation, not to mention a violation of its own CSC, it obviously needs to establish a mechanism that allows a prompt response to complaints of this sort over the summer months.”

Haidak v. Univ. of Mass. At Amherst, 299 F. Supp. 3d 242, 267 (D. Mass. 2018)

35



36



The institution has the right to take interim action when there is a threat to the health or safety of an individual (including self) or others.

There is a line when an action moves from being a supportive measure to an "emergency removal."

The institution determines the process (must have the opportunity to challenge), scope, and conditions.

Interim actions are not long-term solutions. The clock is ticking.

© 2023 D. Stafford & Associates 37

37



Safety & Risk Analysis

- Case-specific approach examining the current situation to determine if an articulable and significant threat exists.

Threat Assessment

- Holistic approach examining the person to determine the level of concern as to whether someone poses a threat (not necessarily immediate), not if they made a threat.

There may be situations where a threat assessment is also appropriate. The safety & risk analysis is about the possible emergency removal/interim action.

© 2023 D. Stafford & Associates 38

38



THE ANALYSIS



© 2023 D. Stafford & Associates 39

39



D. STAFFORD & ASSOCIATES

WHAT IS A THREAT?

“A threat is an expression of intent to do harm or act out violently against someone or something. A threat can be spoken, written, or symbolic - for example, motioning with one’s hands as though shooting at another person.”

(O’Toole, 2000)

“Perceived possibility of harm (i.e., potential danger)”

(Meloy & Hoffman, 2021)

© 2023 D. Stafford & Associates 40

40

D. STAFFORD & ASSOCIATES

THREE THREAT CATEGORIES

<p>Direct Threat</p> <p>Clear statement of an intent to commit harm without any conditions or recourse for the intended target</p>	<p>Veiled Threat</p> <p>Indirect, vague, or subtle statements suggesting potential harm without conditions stated to avoid the danger</p>	<p>Conditional Threat</p> <p>Threatening statements that portend harm with conditions that can avoid a violent outcome</p>
---	--	---

(Meloy & Hoffman, 2021)

© 2023 D. Stafford & Associates 41

41

D. STAFFORD & ASSOCIATES

FOUR AREAS TO EXAMINE



COMPLAINT



THREAT-RELATED BEHAVIORS



THREAT ENHANCERS



THREAT MITIGATORS

© 2023 D. Stafford & Associates 42

42



THE COMPLAINT



What is the substance and status of the complaint?



What are the initial threat-related concerns?



Is there an active threat that requires immediate action?

© 2023 D. Stafford & Associates 43

43

THE COMPLAINT

Complainant: Taylor Livingston **Respondent: Logan Aubuchon**

I first met Logan last March. Logan kept insisting that we were meant to be together. I finally relented in May, and we started to date. During our relationship, Logan insisted that I share my location though Logan didn't share their location with me. Logan would accuse me of liking other people and cheating. Logan once keyed my friend Jordan's car when Logan thought that I was spending too much time with Jordan.

Last week, on Monday, October 24, I was at Logan's off-campus apartment. I wanted to go home, but Logan refused to drive me home until we had sex. I told Logan that I didn't want to, but I was afraid as I knew Logan had a gun under their pillow. I consented, and we had sex.

Logan then drove me to my residence hall. Once we got there, we went into my room. My roommate, who is afraid of Logan, saw us and immediately left. Logan wanted to have sex again, and I refused. Logan told me that if I didn't have sex, I would regret it. Logan pushed me onto the bed, took off my pants, and penetrated me. As Logan was putting on their coat, I think I saw the gun in the inside pocket.



© 2023 D. Stafford & Associates 44

44



THREAT-RELATED BEHAVIORS

- What are the threat-related behaviors that you learned when examining the complaint?
- What other information exists to cause concern for the immediate health and safety of the individual or others?
 - Remember: You are not investigating the allegations. You are collecting information specific to any immediate threat.

© 2023 D. Stafford & Associates 45

45

OTHER INFORMATION



- Text messages from Logan to Taylor:
 - Logan has threatened suicide if Taylor were to break up with Logan. The most recent text threatening suicide was three days ago.
 - Logan has threatened Taylor ("I will mess up your face so no one will want to look at you") after seeing Taylor with Jordan (a week ago).
- The Title IX office has a withdrawn complaint from Taylor that was submitted back in August. Taylor had alleged that Logan was physically abusive. No contact letters were issued, which Logan violated. Taylor withdrew the complaint and told Title IX that it was all a misunderstanding.
- Logan has three registered guns.
- Taylor reported to Title IX today that they are afraid Logan knows something is going on. In the last two days, Logan has insisted on walking Taylor to class and then will wait outside the classroom for Taylor.

© 2023 D. Stafford & Associates

46

46



THREAT ENHANCERS

- What are the existing realities about the person of concern and the case that may increase the risk of violence?
- Are there behaviors arising from the allegations that are accelerating and causing an elevated concern?
- What are the possible triggers that could precipitate impulsive/reactive violence?
- What are the possible stressors that are causing tension or anxiety?

© 2023 D. Stafford & Associates

47

47

Logan's Threat Enhancers



© 2023 D. Stafford & Associates

48

48

D. STAFFORD & ASSOCIATES

THREAT MITIGATORS

- What are the protective factors that may prevent the person of concern from committing an act of violence?
- What does their support network look like?
- What circumstances exist to reduce the likelihood of violence?

© 2023 D. Stafford & Associates 49

49



Logan's Threat Mitigators

© 2023 D. Stafford & Associates 50

50



Put it all together and decide - Is there an immediate threat arising from the allegations?

© 2023 D. Stafford & Associates 51

51

DOCUMENTATION - FILE CONTENTS

- Document that identifies:
 - Presenting issue
 - Threat-related concerns
 - Threat enhancers
 - Threat mitigators
 - Rationale
- Complaint
- Supporting documentation

52

INTERIM ACTION EXAMPLES



- What is the action you can take that will mitigate the threat with the least harm to all involved?
- What conditions may be imposed?

53

LOGISTICS



54

PROCESS FLOWCHART

Is there a concern about an immediate threat?	No - Do not conduct an analysis Yes - Conduct the analysis
Analysis - Is there an immediate threat?	No - No further action with this process Yes - Proceed to interim action
Determine the interim action	Conditions
Challenge	Review of the challenge and determination
Monitoring	Who is responsible for ensuring the action is imposed and monitored?
Review - adjust as needed	As the case proceeds, review to determine if the interim action is still needed to address the threat

© 2023 D. Stafford & Associates 55

55



56

CHARACTERISTICS OF EFFECTIVE INTERIM ACTION PERSONNEL

Empathetic	Direct, firm, and kind	Calm and discreet
Objective	Organized with good follow through	Able to adjust and adapt

© 2023 D. Stafford & Associates 57

57





PLAN

- Timing
- Attendees
- Location
- Letter and resource documents
- Contingency plans

58

58



THE LETTER

{date} Case Number: {case number}

{respondent's name}
 {respondent's address}

Dear {respondent}:

I have received information regarding your alleged involvement in a {incident date} at {incident location} involving {parties}. The incident is described as {description}.

As a result of this information, and in accordance with {institution}'s {policy name}, I am imposing an {Interim Suspension, Interim Removal from Housing, etc.}. Effective {date and time}, {identify the restriction}.

© 2023 D. Stafford & Associates 59

59



THE LETTER, CONTINUED

An interim action is not a sanction. This action is preliminary in nature and is utilized when information indicates that your presence on campus poses an immediate threat to the health and safety of others. It is in effect until the matter is resolved through the institution's resolution process.

You will face additional policy allegations if you do not comply with this administrative action.

You may challenge this decision in writing by {provide direction as to how to submit it} no later than {time} on {date}. Your challenge will be reviewed, and you will be notified of the decision.

Please do not hesitate to contact me at {contact information} if you have any questions.

Sincerely,
 {signature, name, and position}

© 2023 D. Stafford & Associates 60

60



D. STAFFORD & ASSOCIATES

PHYSICAL ENVIRONMENT

- Other attendees
- Furniture
- Lighting
- Displayed items
- Coping tools
- Clothing
- Safety measures

© 2022 D. Stafford & Associates 61

61



D. STAFFORD & ASSOCIATES

VIRTUAL ENVIRONMENT

- Not ideal
- Other attendees
- Background
- Camera on
- Privacy
- Safety measures

© 2022 D. Stafford & Associates 62

62



D. STAFFORD & ASSOCIATES

THE MEETING



Explain but not debate



Treat the person with dignity



Be patient



Help to problem solve



Know where they are going

© 2022 D. Stafford & Associates 63

63



64



65



66



67



OTHER D. STAFFORD TRAINING OPPORTUNITIES

<p>Title IX Coordinator Track</p> <ul style="list-style-type: none"> <input type="checkbox"/> Tier 1: Law and Policy <input type="checkbox"/> Tier 2: Sex Discrimination Response <input checked="" type="checkbox"/> Tier 3: Safety & Risk Analyses for Sex-Based Harassment Emergency Removals 	<p>Investigator Track</p> <ul style="list-style-type: none"> <input type="checkbox"/> Tier 1: Sex-Based Harassment Investigations <input type="checkbox"/> Tier 2: Dating/Domestic Violence and Stalking (DVDVS) Investigations <input type="checkbox"/> Tier 3: Case Study and Simulation (Interviewing) <input type="checkbox"/> Tier 4: Statement Analysis <input type="checkbox"/> Tier 5: Report Writing <input type="checkbox"/> Tier 6: Technology & Investigations <input type="checkbox"/> Tier 7: Violence Against Men 	<p>Related Offerings</p> <ul style="list-style-type: none"> <input type="checkbox"/> Institutional trainings <input type="checkbox"/> Threat Assessment Teams <input type="checkbox"/> Clery Compliance <input type="checkbox"/> Procedural Justice <input type="checkbox"/> Appellate Officer (www.naccop.org) <input type="checkbox"/> Constructing Resolution Processes (www.naccop.org) <input type="checkbox"/> Title IX Webinars (www.naccop.org)
--	--	---

For more information: dstaffordandassociates.com

© 2023 D. Stafford & Associates 68

68



THANK YOU



© 2023 D. Stafford & Associates 69

69



Title IX Bibliography

- ABC. (n.d.). *Schoolhouse Rock – “I’m just a bill”*. YouTube. Retrieved January 21, 2022, from <https://www.youtube.com/watch?v=l6MinvU93kl>
- Alexander, M. (2012). *The New Jim Crow*. New Press.
- American Council on Education. (2020, September 10). *Race and ethnicity of college and university presidents over time*. Race and Ethnicity in Higher Education. Retrieved January 21, 2022, from <https://www.equityinhighered.org/indicators/postsecondary-faculty-and-staff/race-and-ethnicity-of-college-and-university-presidents-over-time/>
- Anderson, M., Vogels, E. A., & Turner, E. (2020, October 2). *The Virtues and Downsides of Online Dating*. Pew Research Center: Internet, Science & Tech. Retrieved from <https://www.pewresearch.org/internet/2020/02/06/the-virtues-and-downsides-of-online-dating/>
- Anderson, N., & Clement, S. (2015, June 12). *Poll shows that 20 percent of women are sexually assaulted in college*. The Washington Post. Retrieved from <https://www.washingtonpost.com/sf/local/2015/06/12/1-in-5-women-say-they-were-violated/>
- Anti-Defamation League. (n.d.). A Brief History of Disability Rights Movement. Retrieved January 17, 2022, from <https://www.adl.org/education/resources/backgrounders/disability-rights-movement>
- Areen, J., & Lake, P. F. (2014). *Higher Education and the Law*. Foundation press.
- Barlow, J. N. (2020, February). *Black women, the forgotten survivors of sexual assault*. American Psychological Association. Retrieved from <https://www.apa.org/pi/about/newsletter/2020/02/black-women-sexual-assault>
- Bedera, N. (2017). Moaning and Eye Contact: College Men's Negotiations of Sexual Consent in Theory and in Practice. <https://doi.org/10.31235/osf.io/eqfya>
- Boyle, K. M. (2015). Social Psychological Processes that Facilitate Sexual Assault within the Fraternity Party Subculture. *Sociology Compass*, 9(5), 386–399. <https://doi.org/10.1111/soc4.12261>
- Brown, J. T. (2012). *The parent's guide to college for students on the autism spectrum*. Autism Asperger Pub. Co.
- Bryant, J. (2021, November 11). *How many Americans have a college degree? BestColleges*. BestColleges.com. Retrieved January 21, 2022, from <https://www.bestcolleges.com/news/analysis/2021/07/01/how-many-americans-have-college-degrees/>

- Campbell, R., Bybee, D., Townsend, S. M., Shaw, J., Karim, N., & Markowitz, J. (2014). The Impact of Sexual Assault Nurse Examiner Programs on Criminal Justice Case Outcomes. *Violence Against Women, 20*(5), 607–625. <https://doi.org/10.1177/1077801214536286>
- Canan, S. N., Jozkowski, K. N., & Crawford, B. L. (2016). Sexual Assault Supportive Attitudes: Rape Myth Acceptance and Token Resistance in Greek and Non-Greek College Students From Two University Samples in the United States. *Journal of Interpersonal Violence, 33*(22), 3502–3530. <https://doi.org/10.1177/0886260516636064>
- Cantor, D., Fisher, B., Chibnall, S., Townsend, R., Lee, H., Bruce, C., & Thomas, G. (2017, October 20). *Report on the AAU Campus Climate Survey on Sexual Assault ...* Retrieved from <https://www.aau.edu/sites/default/files/AAU-Files/Key-Issues/Campus-Safety/AAU-Campus-Climate-Survey-FINAL-10-20-17.pdf>
- Center for Applied Special Technology. (2020, September 25). *Timeline of Innovation*. CAST. Retrieved from <https://www.cast.org/impact/timeline-innovation>
- Center for Applied Special Technology. (n.d.). *UDL On Campus*. UDL On Campus: Home. Retrieved from <http://udloncampus.cast.org/home>
- The Centers for Disease Control and Prevention. (2010). *NISVS: An Overview of 2010 Findings on Victimization by Sexual Orientation*. National Intimate Partner and Sexual Violence Survey (NISVS): 2010 Findings on Victimization by Sexual Orientation. Retrieved from https://www.cdc.gov/violenceprevention/pdf/cdc_nisvs_victimization_final-a.pdf
- Centers for Disease Control and Prevention. (2019). Centers for Disease Control and Prevention. Retrieved from <https://www.cdc.gov/violenceprevention/publichealthissue/social-ecologicalmodel.html>
- Centers for Disease Control and Prevention. (2020, June 1). *Sexual Violence and Intimate Partner Violence Among People with Disabilities | Violence Prevention | Injury Center | CDC*. Centers for Disease Control and Prevention. Retrieved from <https://www.cdc.gov/violenceprevention/datasources/nisvs/svandipv.html>
- Chambers, J. C., Horvath, M. A. H., & Kelly, L. (2010). A Typology of Multiple-Perpetrator Rape. *Criminal Justice and Behavior, 37*(10), 1114–1139. <https://doi.org/10.1177/0093854810377971>
- Cho, H., Seon, J., Choi, G.-Y., An, S., Kwon, I., Choi, Y. J., Hong, S., Lee, J. O., Son, E., & Yun, S. H. (2020). Gender Differences in Intimate Partner Violence Victimization, Help-Seeking, And Outcomes Among College Students. *Advances in Social Work, 20*(1), 22–44. <https://doi.org/10.18060/23675>
- Civil Rights Act of 1964 § 7, 42 U.S.C. § 2000e et seq (1964) (n.d.).
- Coaston, J. (2019, May 20). *The intersectionality wars*. Vox. Retrieved from <https://www.vox.com/the-highlight/2019/5/20/18542843/intersectionality-conservatism-law-race-gender-discrimination>

- Cocks, C. L., & Brown, F. C. L. (2020). The Philosophy of Student Conduct and the Student Conduct Professional. In *Student conduct practice: the complete guide for student affairs professionals* (pp. 23–35). essay, Stylus Publishing.
- Congressional Research Service, & McCallion, G., History of the Clery Act: Fact sheet (2014). Washington, DC; Congressional Research Service.
- Congressional Research Service, & Sacco, L. N., The Violence Against Women Act (VAWA): Historical Overview, Funding, and Reauthorization (2019). Washington, DC; Congressional Research Service.
- Crager, M., Cousin, M., & Hardy, T. (2003, April). *Victim-Defendants: An Emerging Challenge in Responding to Domestic Violence in Seattle and the King County Region*. King County Coalition Against Domestic Violence. Retrieved from <https://endgv.org/wp-content/uploads/2016/03/victimdefendantfinalreport111.pdf>
- Crenshaw, K. (2018). Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory, and Antiracist Politics [1989]. *Feminist Legal Theory*, 57–80. <https://doi.org/10.4324/9780429500480-5>
- Cruz, J. V. (2018, December 24). *Five Things to Know When Working with Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ) Sexual Violence Survivors*. Justice Clearinghouse. Retrieved from <https://www.justiceclearinghouse.com/resource/five-things-to-know-when-working-with-lesbian-gay-bisexual-transgender-and-queer-lgbtq-sexual-violence-survivors/>
- Dannells, M. (1997). *From discipline to development: rethinking student conduct in higher education*. EIC Clearinghouse on Higher Education, Institute for Education Policy Studies, Graduate School of Education and Human Development, the George Washington University.
- daSilva, T., Harkins, L., & Woodhams, J. (2013). Multiple perpetrator rape: An international phenomenon. *Handbook on the Study of Multiple Perpetrator Rape*, 30–56. <https://doi.org/10.4324/9780203083406-9>
- daSilva, T., Woodhams, J., & Harkins, L. (2017). “An Adventure That Went Wrong”: Reasons Given by Convicted Perpetrators of Multiple Perpetrator Sexual Offending for Their Involvement in the Offense. *Archives of Sexual Behavior*, 47(2), 443–456. <https://doi.org/10.1007/s10508-017-1011-8>
- Dating App Revenue and Usage Statistics (2021)*. Business of Apps. (2021, January 25). Retrieved from <https://www.businessofapps.com/data/dating-app-market/>
- Davis, D.-M. (2020, December 24). *24 slang words teens and Gen Zers are using in 2020, and what they really mean*. Business Insider. Retrieved from <https://www.businessinsider.com/slang-words-terms-teens-current-2019-8#extra-to-be-extra-is-to-be-unnecessarily-dramatic-and-over-the-top-1>
- DiAngelo, R. J. (2018). *White Fragility: Why It's So Hard for White People to Talk about Racism*. Beacon Press.

- Durham, J. J. (2018, November 27). *The Differences and Similarities of Restorative Justice and Mediation*. Pathways to Restorative Communities. Retrieved from <https://www.pathways2rc.com/news/2018/10/24/the-differences-and-similarities-of-restorative-justice-and-mediation>
- Electronic Privacy Information Center. (n.d.). *Family educational rights and privacy act (FERPA)*. Family Educational Rights and Privacy Act (FERPA). Retrieved January 19, 2022, from <https://epic.org/family-educational-rights-and-privacy-act-ferpa/>
- Federal Register. Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance, 34 CFR 106. (2019).
- FIRE. (n.d.). *Campus rights: What we defend*. FIRE. Retrieved January 16, 2022, from <https://www.thefire.org/about-us/campus-rights/>
- Foubert, J. D., Brosi, M. W., & Bannon, R. S. (2011). Pornography Viewing among Fraternity Men: Effects on Bystander Intervention, Rape Myth Acceptance and Behavioral Intent to Commit Sexual Assault. *Sexual Addiction & Compulsivity*, 18(4), 212–231. <https://doi.org/10.1080/10720162.2011.625552>
- Foubert, J. D., Clark-Taylor, A., & Wall, A. F. (2019). Is Campus Rape Primarily a Serial or One-Time Problem? Evidence From a Multicampus Study. *Violence Against Women*, 107780121983382. <https://doi.org/10.1177/1077801219833820>
- Gehring, D. D. (2001). The Objectives of Student Discipline and The Process That's Due: Are They Compatible? *Journal of Student Affairs Research and Practice*, 38(4), 466–481. <https://doi.org/10.2202/1949-6605.1155>
- Gladwell, M. (2019). *Talking to strangers: what we should know about the people we dont know*. Little, Brown and Company.
- Goldman, T., & Chappell, B. (2019, January 10). *How Bernice Sandler, 'godmother of title IX,' achieved landmark discrimination ban*. NPR. Retrieved January 21, 2022, from <https://www.npr.org/2019/01/10/683571958/how-bernice-sandler-godmother-of-title-ix-achieved-landmark-discrimination-ban>
- Gravelin, C. R., Biernat, M., & Bucher, C. E. (2019). Blaming the Victim of Acquaintance Rape: Individual, Situational, and Sociocultural Factors. *Frontiers in Psychology*, 9. <https://doi.org/10.3389/fpsyg.2018.02422>
- Greenhouse, M., BrckaLorenz, A., Hoban, M., Huesman, R., Rankin, S., & Stolzenberg, E. B. (2018, August). *Queer-Spectrum and Trans-Spectrum Student Experiences in American Higher Education*. Tyler Clementi Center for Diversity Education and Bias Prevention. Retrieved from <https://clementicenter.rutgers.edu/research-insights-and-events/campus-climate-queer-spectrum-and-trans-spectrum-higher-education>
- Harris, J. C., & Linder, C. (2017). *Intersections of identity and sexual violence on campus: centering minoritized students experiences*. Stylus Publishing.

- Hegji, A. (2021, August 17). The Higher Education Act (HEA): A Primer. Retrieved January 21, 2022, from <https://sgp.fas.org/crs/misc/R43351.pdf>
- Hirsch, J. S., & Khan, S. (2020). *Sexual Citizens: A Landmark Study of Sex, Power, and Assault on Campus*. W. W. Norton & Company.
- Human Rights Campaign. (n.d.). Sexual Assault and the LGBTQ Community. Retrieved from <https://www.hrc.org/resources/sexual-assault-and-the-lgbt-community>
- International Institute for Restorative Practices*. (n.d.). Retrieved from <https://www.iirp.edu/>
- Interrogation: A Review of the Science HIG Report*. (2017, March 23). Retrieved from <https://www.fbi.gov/file-repository/hig-report-interrogation-a-review-of-the-science-september-2016.pdf/view>
- Irving, D. (2018). *Waking up White: And Finding Myself in the Story of Race*. Elephant Room Press.
- Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1990, 20 U.S.C. §1092. (n.d.).
- Jeanne Shaheen. (2022, January 12). *Shaheen, Hassan introduce Bill to combat sexual violence against students with disabilities*. U.S. Senator Jeanne Shaheen of New Hampshire. Retrieved January 17, 2022, from <https://www.shaheen.senate.gov/news/press/shaheen-hassan-introduce-bill-to-combat-sexual-violence-against-students-with-disabilities>
- Johnson, P. A., Widnall, S. E., & Benya, F. F. (2018). *Sexual harassment of women: climate, culture, and consequences in academic sciences, engineering, and medicine*. The National Academies Press.
- Judge, J., & O'Brien, T. (2012). *Equity and Title IX in Intercollegiate Athletics: A Practical Guide for Colleges and Universities*. NCAA Publications. Retrieved from www.NCAA.org/gender_equity
- Kaplin, W. A., Lee, B. A., Hutchens, N. H., & Rooksby, J. H. (2020). *Law of Higher Education: Student Version* (Sixth). Jossey-Bass.
- Kendi, I. X. (2021). *How To Be An Antiracist*. Vintage.
- Kidder, R. M. (2006). *Moral courage*. Harper.
- Kidder, R. M. (2009). *How good people make tough choices: resolving the dilemmas of ethical living*. Harper.
- Koss, M. P., Dinero, T. E., Seibel, C. A., & Cox, S. L. (1988). Stranger and Acquaintance Rape: Are There Differences In the Victim's Experience? *Psychology of Women Quarterly*, 12(1), 1–24. <https://doi.org/10.1111/j.1471-6402.1988.tb00924.x>
- Krebs, C. P., Lindquist, C. H., Warner, T., Fisher, B. S., & Martin, S. L. (2007, December). The Campus Sexual Assault (CSA) Study. Retrieved from <https://www.ncjrs.gov/pdffiles1/nij/grants/221153.pdf>

- Lacey, A., & Murray, C. (2015). *The Nuts and Bolts of Reauthorization*. Career Education Review. Retrieved from <https://www.thompsoncoburn.com/docs/default-source/publication-documents/the-nuts-and-bolts-of-reauthorization.pdf?sfvrsn=0&sfvrsn=0>
- Lake, P. F. (2009). *Beyond Discipline: Managing the Modern Higher Education Environment*. Hierophant Enterprises, Inc.
- Lake, P. F. (2011). *Foundations of Higher Education Law & Policy: Basic Legal Rules, Concepts, and Principles for Student Affairs*. NASPA.
- Lake, P. F. (2013). *The Rights and Responsibilities of the Modern University: The Rise of the Facilitator University*. Carolina Academic Press.
- Lancaster, J. M. (2006). *Exercising Power with Wisdom: Bridging Legal and Ethical Practice with Intention*. College Administration Publications.
- Legal Momentum. (n.d.). *History of VAWA*. History of VAWA | Legal Momentum. Retrieved January 16, 2022, from <https://www.legalmomentum.org/history-vaawa>
- Martin, G. (2020, May 28). *What are Gender Pronouns? Why Do They Matter?* National Institutes of Health. Retrieved from <https://www.edi.nih.gov/blog/communities/what-are-gender-pronouns-why-do-they-matter>
- McClish, M. (2001). *I know you are lying: detecting deception through statement analysis*. Marpa Group, Inc.
- McLeod, S. (2019, October 24). *Social Identity Theory*. Social Identity Theory | Simply Psychology. Retrieved from <https://www.simplypsychology.org/social-identity-theory.html>
- Mechanic, M. B., Resick, P. A., & Griffin, M. G. (1998). A comparison of normal forgetting, psychopathology, and information-processing models of reported amnesia for recent sexual trauma. *Journal of Consulting and Clinical Psychology*, 66(6), 948–957. <https://doi.org/10.1037/0022-006x.66.6.948>
- Meloy, J. R., Mohandie, K., & Green, M. (2011). The Female Stalker. *Behavioral Sciences & the Law*, 29(2), 240–254. <https://doi.org/10.1002/bsl.976>
- National Council on Disability. (2018, January 30). *Not on the Radar: Sexual Assault of College Students with Disabilities*. National Council on Disability. Retrieved from https://ncd.gov/sites/default/files/NCD_Not_on_the_Radar_Accessible_01292018.pdf
- National District Attorneys Association - Women Prosecutors Section. (2017, July 17). *National Domestic Violence Prosecution Best Practices Guide*. NATIONAL DOMESTIC VIOLENCE PROSECUTION BEST PRACTICES GUIDE. Retrieved from <https://ndaa.org/wp-content/uploads/NDAADVWhitePaperFINALrevisedJuly1720171.pdf>
- National Sexual Violence Resource Center and Pennsylvania Coalition Against Rape. (2012). *Sexual Violence & Individuals Who Identify as LGBTQ*. NSVRC_Research-Brief_Sexual-Violence-

LGBTQ. Retrieved from https://www.nsvrc.org/sites/default/files/Publications_NSVRC_Research-Brief_Sexual-Violence-LGBTQ.pdf

National Women's Law Center. (2000). *A Basic Guide to Title IX*. National Women's Law Center. Retrieved from <https://www.nwlc.org/sites/default/files/pdfs/ABasicGuidetoTitleIX.pdf>

Natow, R. S. (2017). *Higher education rulemaking: the politics of creating regulatory policy*. Johns Hopkins University Press.

Ohio Alliance to End Sexual Violence. (n.d.). The Violence Against Women Act of Reauthorization of 2021. Retrieved January 17, 2022, from https://oaesv.org/wp-content/uploads/2021/04/factsheet_vawa_2021.pdf

Orantes, E., & Sharma, A. (2019, March 4). *Title IX Compliance Creates Hurdles for Collegiate eSports Programs*. JD Supra. Retrieved from <https://www.jdsupra.com/legalnews/title-ix-compliance-creates-hurdles-for-99240/>

Orcutt, M., Petrowski, P. M., Karp, D. R., & Draper, J. (2020, June). *The Journal of College and University Law*. RESTORATIVE JUSTICE APPROACHES TO THE INFORMAL RESOLUTION OF STUDENT SEXUAL MISCONDUCT. Retrieved from https://jcul.law.rutgers.edu/wp-content/uploads/2020/08/45_jcul_No2_FULL.pdf

Pacheco, R. (2020, May). Not Online. Not on Campus: Addressing Sexual Violence and Technology-Facilitated Violence on Campuses. Retrieved from <https://ywcacanada.ca/wp-content/uploads/2020/08/Not-Online.-Not-On-Campus.-Report.pdf>

Paine, L. S. (2014, August 1). *Managing for Organizational Integrity*. Harvard Business Review. Retrieved from <https://hbr.org/1994/03/managing-for-organizational-integrity>

Partners in Leadership. (2019, May 29). *The Three Values of Organizational Integrity*. Culture Management Experts. Retrieved from <https://www.partnersinleadership.com/insights-publications/the-three-values-of-organizational-integrity/>

Pew Research Center. (2020, June 5). *Demographics of Social Media Users and Adoption in the United States*. Pew Research Center: Internet, Science & Tech. Retrieved from <https://www.pewresearch.org/internet/fact-sheet/social-media/>

Practical Psychology. (2020, April 15). *Ebbinghaus Forgetting Curve (Definition + Examples)*. Practical Psychology. Retrieved from <https://practicalpie.com/ebbinghaus-forgetting-curve/>

The Pregnant Scholar. (2020, September 29). *The Pregnant Scholar Homepage: Tools to support student parents*. The Pregnant Scholar. Retrieved from <https://thepregnantscholar.org/>

Public policy recommendation: Addressing campus sexual ... (n.d.). Retrieved from <https://www.atsa.com/pdfs/Policy/Addressing%20Campus%20Sexual%20Misconduct%20FINAL.pdf>

- Rothstein, R. (2018). *The Color of Law: A Forgotten History of How Our Government Segregated America*. Liveright Publishing Corporation, a division of W.W. Norton & Company.
- Seabrook, R. C., Ward, L. M., & Giaccardi, S. (2018). Why is fraternity membership associated with sexual assault? Exploring the roles of conformity to masculine norms, pressure to uphold masculinity, and objectification of women. *Psychology of Men & Masculinity*, 19(1), 3–13. <https://doi.org/10.1037/men0000076>
- Seelye, K. Q. (2019, January 8). *Bernice Sandler, 'godmother of title IX,' dies at 90*. The New York Times. Retrieved January 21, 2022, from <https://www.nytimes.com/2019/01/08/obituaries/bernice-sandler-dead.html>
- Sex Offender Management Assessment and Planning Initiative*. (2017, April). Retrieved from https://smart.gov/SOMAPI/pdfs/SOMAPI_Full%20Report.pdf
- Sloan, J. J., & Fisher, B. (2011). *The Dark Side of the Ivory Tower: Campus crime as a social problem*. Cambridge University Press.
- Stanford Journalism. (2019). *Celebrating 47 Years of Title IX and Bernice Sandler*. YouTube. Retrieved January 21, 2022, from https://youtu.be/F_B7-HwaqP4.
- Stark-Mason, R. (2020, February 26). *Name, Image, Likeness*. NCAA.org - The Official Site of the NCAA. Retrieved from <http://www.ncaa.org/champion/name-image-likeness>
- Steinfeld, E., & Maisel, J. (2012). *Universal Design Creating Inclusive Environments*. John Wiley & Sons.
- Stoner, E. N., & Lowery, J. W. (2004). Navigating Past The “Spirit of Insubordination”: A Twenty-First Century Model Student Conduct Code. *Journal of College and University Law*, 31(1), 1–78.
- Title IX of The Education Amendments of 1972, 20 U.S.C. A§ 1681 Et. (n.d.).
- Toure, K., & Hamilton, C. V. (1992). *Black Power: The politics of liberation in America*. Vintage Books.
- Tracy, C. E., Fromson, T. L., Long, J. G., & Whitman, C. (2012, June 5). *Rape and Sexual Assault in the Legal System*. Women's Law Project. Retrieved from <https://www.womenslawproject.org/wp-content/uploads/2016/04/Rape-and-Sexual-Assault-in-the-Legal-System-FINAL.pdf>
- Tumulty, K. (2004, May 17). *Evaluating the success of the Great Society*. The Washington Post. Retrieved January 21, 2022, from <https://www.washingtonpost.com/wp-srv/special/national/great-society-at-50/>
- U.S. Department of Education (ED). (2020, January 10). *Know Your Rights: Pregnant or Parenting? Title IX Protects You From Discrimination At School*. Home. Retrieved from <https://www2.ed.gov/about/offices/list/ocr/docs/dcl-know-rights-201306-title-ix.html>

- U.S. Department of Education (ED). (2020, January 10). *Students with disabilities preparing for postsecondary education*. Office of Civil Rights. Retrieved January 17, 2022, from <https://www2.ed.gov/about/offices/list/ocr/transition.html>
- U.S. Department of Education (ED). (2021, August 20). *Title IX and sex discrimination*. Title IX. Retrieved January 21, 2022, from https://www2.ed.gov/about/offices/list/ocr/docs/tix_dis.html
- U.S. Department of Education. (2002, June 1). *Legislative history of major Ferpa provisions*. Legislative History of Major FERPA Provisions I Protecting Student Privacy. Retrieved January 19, 2022, from <https://studentprivacy.ed.gov/resources/legislative-history-major-ferpa-provisions>
- U.S. Department of Education. (2012, October). *Title IX and access to courses and programs in STEM Office for Civil Rights, Department of Education Revised October 2012*. Office of Civil Rights Presentations. Retrieved from <https://www2.ed.gov/about/offices/list/ocr/presentations/stem-t9-powerpoint.pdf>
- U.S. Department of Education. (n.d.). *The NCES Fast Facts Tool provides quick answers to many education questions (National Center for Education Statistics)*. National Center for Education Statistics (NCES) Home Page. Retrieved January 17, 2022, from <https://nces.ed.gov/fastfacts/display.asp?id=60>
- U.S. Department of Education. (n.d.). *The NCES Fast Facts Tool provides quick answers to many education questions (National Center for Education Statistics)*. National Center for Education Statistics (NCES) Home Page. Retrieved January 21, 2022, from <https://nces.ed.gov/fastfacts/display.asp?id=93>
- U.S. Government. (n.d.). *U.S. Federal Courts Circuit Map - United States Courts*. U.S. Federal Courts Circuit Map. Retrieved January 21, 2022, from https://www.uscourts.gov/sites/default/files/u.s._federal_courts_circuit_map_1.pdf
- University of Buffalo. (2020, February 24). *Universal Design*. IDEA Center. Retrieved from <https://idea.ap.buffalo.edu/about/universal-design/>
- Vallano, J. P., & Schreiber Compo, N. (2015). Rapport-building with cooperative witnesses and criminal suspects: A theoretical and empirical review. *Psychology, Public Policy, and Law*, 21(1), 85–99. <https://doi.org/10.1037/law0000035>
- Varnell, S. (2013). *Statement analysis: an Iss course workbook*. Steven Varnell.
- Vector Solutions. (n.d.). Title IX: 5 ways it changed education for the better. Retrieved January 21, 2022, from <https://www.vectorsolutions.com/resources/blogs/title-ix-positive-changes/>
- Wachtel, T. (2016, November). *Defining Restorative*. International Institute for Restorative Practices. Retrieved from <https://www.iirp.edu/defining-restorative/restorative-practices/defining-restorative/>
- Waryold, D. M., & Lancaster, J. M. (2020). *Student Conduct Practice: The Complete Guide for Student Affairs Professionals*. Stylus Publishing.

Williamsen, D. K. K., Karp, D., & Williamsen, K. (2020, March 12). 5 Things Restorative Justice Sexual Harm. Retrieved from <https://www.naspa.org/report/five-things-student-affairs-administrators-should-know-about-restorative-justice-and-campus-sexual-harm>

Woodhams, J., Taylor, P. J., & Cooke, C. (2020). Multiple perpetrator rape: Is perpetrator violence the result of victim resistance, deindividuation, or leader–follower dynamics? *Psychology of Violence, 10*(1), 120–129. <https://doi.org/10.1037/vio0000255>

Yoshino, K. (2006). *Covering: The hidden assault on American civil rights*. Random House.

Threat Assessment Bibliography

- Amazon Prime. (n.d.). *We Are Columbine*. <https://www.amazon.com/We-Are-Columbine-Gustavo-DArthenay/dp/B07P887252>.
- American College Health Association. American College Health Association-National College Health Assessment III: Reference Group Executive Summary Fall 2020. Silver Spring, MD: American College Health Association; 2020.
- Baker-Smith, C., Coca, V., Goldrick-Rab, S., Looker, E., Richardson, B., & Williams, T. (2020). (rep.). #RealCollege 2020: Five Years of Evidence on Campus Basic Needs Insecurity. The Hope Center for College, Community, and Justice https://hope4college.com/wp-content/uploads/2020/02/2019_RealCollege_Survey_Report.pdf. Retrieved July 13, 2022.
- Borum, R., Fein, R., Vossekuil, B., & Berglund, J. (1999). Threat assessment: defining an approach for evaluating risk of targeted violence. *Behavioral Sciences & the Law*, 17(3), 323–337. [https://doi.org/10.1002/\(sici\)1099-0798\(199907/09\)17:3<323::aid-bsl349>3.0.co;2-g](https://doi.org/10.1002/(sici)1099-0798(199907/09)17:3<323::aid-bsl349>3.0.co;2-g)
- Brown, J. T. (2012). *The parent's guide to college for students on the autism spectrum*. Autism Asperger Pub. Co.
- Calhoun, F. S. (2000). *Hunters and howlers: threats and violence against federal judicial officials in the United States, 1789-1993*. Diane.
- Carlisle, N. (2018, October 25). Man who killed Utah student Lauren McCluskey had a history of sex assault that was downplayed in the criminal justice system. *Salt Lake Tribune*.
- Cawood, J. S., & Corcoran, M. H. (2020). *Violence assessment and intervention: the practitioner's handbook*. Routledge, an imprint of the Taylor & Francis Group.
- CBS News. (2019, May 3). *What we know about the suspected UNC Charlotte shooter*. CBS News. <https://www.cbsnews.com/news/uncc-shooting-suspect-trystan-andrew-terrell-charged-with-murder-today-2019-05-01/>.
- Contrera, J. (2019, January 25). 'Why did you do this?' His brother confessed to gunning down 17 people in Parkland. But he's the only family Zach Cruz has left. *The Washington Post*.
- Cullen, D. (2009). *Columbine*. Grand Central Publishing.
- de Vise, D., & Nakamura, D. (2010, May 15). George Huguely's behavior not reported before Yeardley Love's death. *The Washington Post*.
- Deisinger, G., Randazzo, M., O'Neill, D., & Savage, J. (2008). *The handbook for campus threat assessment & management teams*. Applied Risk Management.
- Dreal, V. J. (2017). *Assessing student threats: implementing the Salem-Keizer system*. Rowman & Littlefield.
- Drysdale, D. A., Modzeleski, W., & Simons, A. B. (2010). *Campus Attacks Targeted Violence Affecting Institutions of Higher Education*. Distributed by ERIC Clearinghouse.

- D’Inverno, A.S., Smith, S.G., Zhang, X., Chen, J. (2019). *The Impact of Intimate Partner Violence: A 2015 NISVS Research-in- Brief*. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention.
- Fagan, K. (2015, May 7). *From The Mag: Penn runner’s depression masked on social media*. ESPN. http://www.espn.com/espn/feature/story/_/id/12833146/instagram-account-university-pennsylvania-runner-showed-only-part-story.
- Fagan, K. (2018). *What made Maddy run: the secret struggles and tragic death of an all-American teen*. Back Bay Books / Little, Brown and Company.
- FBI. (2017, February 24). *Making Prevention a Reality: Identifying, Assessing, and Managing the Threat of Targeted Attacks*. FBI. <https://www.fbi.gov/file-repository/making-prevention-a-reality.pdf/view>.
- Fein, R. A., & Vossekuil, B. (1997). *Preventing Assassination: A Monograph (the Secret Service Exceptional Case Study Project)*. United States Secret Service.
- Fein, R. A., Modzeleski, W., Borum, R., Pollack, W. S., Vossekuil, B., & Reddy, M. (2002). *Threat Assessment in Schools A Guide to Managing Threatening Situations and to Creating Safe School Climates. Revised*. United States Secret Service and United States Department of Education.
- Flaherty, M. P., & Johnson, J. (2012, February 8). Prosecutors: George Huguely e-mail to Yeardley Love said, ‘I should have killed you.’ *The Washington Post*.
- Flaherty, M. P., & Johnson, J. (2012, February 9). George Huguely drank so heavily that friends considered intervention, ex-teammates say. *The Washington Post*.
- Follman, M. (2022). *Trigger Points: Inside The Mission to Stop Mass Shootings in America*. Dey St. An Imprint of William Morrow.
- Friedman, G. (2019, May 30). What really happened to Lauren McCluskey? The inside story of her tragic death. *Deseret News*.
- Goode, E., Kovaleski, S. F., Healy, J., & Frosch, D. (2012, August 26). Before Gunfire, Hints of Bad News. *New York Times*.
- Gurman, S. (2005, September 2). Records Show University’s Response to Holmes. *Seattle Times*.
- Higher Education Mental Health Alliance (HEMHA). (2013, April 9). Balancing Safety and Support on Campus. <https://www.jedfoundation.org/wp-content/uploads/2016/07/campus-teams-balancing-safety-support-campus-jed-guide.pdf>.
- Hollister, B. A., & Scalora, M. J. (2015). Broadening campus threat assessment beyond mass shootings. *Aggression and Violent Behavior, 25*, 43–53. <https://doi.org/10.1016/j.avb.2015.07.005>
- Incels: A Guide to Symbols and Terminology*. Moonshot CVE. (2020, June 8). <http://moonshotcve.com/incels-symbols-and-terminology/>.

- Jaffe, H. (2011, June 1). George Huguey and Yeardeley Love: Love, Death, and Lacrosse. *Washingtonian*.
- The Jed Foundation, Student Mental Health and the Law: A Resource for Institutions of Higher Education. New York, NY: The Jed Foundation, 2008.
- Johnson, E. (2019, September 11). Head of Counseling at Penn Dies in Suicide. *Inside Higher Education*.
- Johnson, M. (2018, January 30). How Responsible are Killers with Brain Damage? *Scientific American*.
- Kilen, M. (2018, November 1). Nov. 1, 1991: Memories of deadly day on University of Iowa campus haunt survivors. *Des Moines Register*.
- Kilen, M. (2018, November 1). Nov. 1, 1991: The day a university campus shooting rampage shocked Iowa. *Des Moines Register*.
- Klonsky, E. D., May, A. M., & Saffer, B. Y. (2016). Suicide, suicide attempts, and Suicidal Ideation. *Annual Review of Clinical Psychology, 12*(1), 307–330. <https://doi.org/10.1146/annurev-clinpsy-021815-093204>
- Klonsky, E. D., Saffer, B. Y., & Bryan, C. J. (2017). Ideation-to-action theories of suicide: A conceptual and empirical update. *Current Opinion in Psychology, 22*, 38–43. <https://doi.org/10.1016/j.copsyc.2017.07.020>
- LaBanc, B. H., & Hemphill, B. O. (Eds.). (2015). *College in the Crosshairs: An administrative perspective on prevention of gun violence*. Stylus Publishing, LLC.
- Langman, P. (2019). Desperate identities. *Criminology & Public Policy, 19*(1), 61–84. <https://doi.org/10.1111/1745-9133.12468>
- Langman, P. (2021). *Warning signs: identifying school shooters before they strike* (First). Langman Psychological Associates, LLC.
- Langman, P. (n.d.). School Shooters.info. <https://schoolshooters.info>.
- Langman, P. F. (2010). *Why kids kill: inside the minds of school shooters*. St. Martins Griffin.
- Langman, P. F. (2015). *School shooters: understanding high school, college, and adult perpetrators*. Rowman & Littlefield.
- Lipsky, L. van D., & Burk, C. (2010). *Trauma stewardship: an everyday guide to caring for self while caring for others*. Accessible Publishing Systems, Pty, Ltd.
- Lysiak, M. (2014). *Newtown: An American tragedy*. Simon & Schuster.
- The Madison Holleran Foundation. (n.d.). <https://www.madisonholleranfoundation.org/>.
- Mai-Duc, C. (2015, October 2). Gun-obsessed, timid and his mom called him 'baby': What we know of Chris Harper-Mercer's life. *Los Angeles Times*.

- Mass shooting data & research*. The Violence Project. (n.d.). Retrieved July 13, 2022, from <https://www.theviolenceproject.org/>
- McGlinchy, A. (2016, August 3). *Changes in police response*. Out Of The Blue. <https://towerhistory.org/changes-police-response-ut-tower-shooting/>.
- Meloy, J. R., & Hoffman, J. (Eds.). (2021). *International Handbook of Threat Assessment*. Oxford University Press.
- MSD Commission. (2019). (rep.). *Marjory Stoneham Douglas High School Public Commission Initial Report*.
- Nakamura, D., Yanda, S., & de Vise, D. (2010, May 23). George Huguely, accused in Yeardeley Love's death, was a man of privilege, rage. *The Washington Post*.
- National Threat Assessment Center, *Enhancing school safety using a threat assessment model: an operational guide for preventing targeted school violence* (2018).
- National Threat Assessment Center, *Mass attacks in public spaces -- 2018* (2018).
- National Threat Assessment Center, *Using a systems approach for threat assessment investigations. A case study on Jared Lee Loughner*. (2015). U.S. Secret Service, Department of Homeland Security.
- Newman, K. S. (2005). *Rampage: the social roots of school shootings*. Basic Books.
- Newman, K. S. (2012, February 28). Why we miss school shooting warning signs. CNN. Retrieved July 13, 2022, from <https://globalpublicsquare.blogs.cnn.com/2012/02/28/school-shooting-warning-signs/>
- Nielsen, J. T., Riseling, S., & Squires, K. (2018). *Independent Review and Report Involving the Conduct and Actions of the University of Utah Department of Public Safety, and Housing and Residential Education, Relating to the Lauren McCluskey Case*. University of Utah.
- Northern Illinois University. (2010). *Report of the February 14, 2008 shootings at Northern Illinois University*.
- O'Toole, M. E. (2000). *The school shooter: A threat assessment perspective*. FBI Academy.
- Perloe, A., & Pollard, J. W. (2016). University counseling centers' role in campus threat assessment and management. *Journal of Threat Assessment and Management*, 3(1), 1–20. <https://doi.org/10.1037/tam0000051>
- Peterson, J., & Densley, J. (2021). *The Violence project: How to stop a mass shooting epidemic*. Abrams Press.
- Reddy, M., Borum, R., Vossekuil, B., Fein, R., Berglund, J., & Modzeleski, W. (2000). *Evaluating Risk for Targeted Violence in Schools Comparing Risk Assessment, Threat Assessment, and Other Approaches*. Distributed by ERIC Clearinghouse.

- Reid, W. H. (2018). *Dark Night In Aurora: Inside James Holmes and the Colorado mass shootings*. Skyhorse Publishing.
- Rugala, E. A., & Isaacs, A. R. (2004). *Workplace violence: issues in response*. Critical Incident Response Group, National Center for the Analysis of Violent Crime, FBI Academy.
- Schulberg, J. (2021, June 16). *Kip Kinkel Is Ready To Speak*. HuffPost. https://www.huffpost.com/entry/kip-kinkel-is-ready-to-speak_n_60abd623e4b0a2568315c62d.
- Secret Service. (2021, March 30). *Averting Targeted School Violence: A U.S. Secret Service Analysis of Plots Against Schools*. Averting Targeted School Violence. <https://www.secretservice.gov/sites/default/files/reports/2021-03/USSS%20Averting%20Targeted%20School%20Violence.2021.03.pdf>.
- Sedensky, S. J. (2013). *Report of the State's Attorney for the Judicial District of Danbury on the shootings at Sandy Hook Elementary School and 36 Yogananda Street, Newtown, Connecticut on December 14, 2012*. Office of the State's Attorney. Judicial District of Danbury.
- Shea, S. C. (2009, December 3). *Suicide assessment part 1: Uncovering suicidal intent-a sophisticated art*. Psychiatric Times. Retrieved October 15, 2022, from <https://www.psychiatrictimes.com/view/suicide-assessment-part-1-uncovering-suicidal-intent-sophisticated-art>.
- Shea, S. C. (2009, December 21). *Suicide assessment part 2: Uncovering suicidal intent using the case approach*. Psychiatric Times. Retrieved October 15, 2022, from <https://www.psychiatrictimes.com/view/suicide-assessment-part-2-uncovering-suicidal-intent-using-case-approach>.
- Sheriff - Coroner, & Brown, B., ISLA VISTA MASS MURDER MAY 23, 2014 INVESTIGATIVE SUMMARY (2015). Santa Barbara County.
- Simon, D., & Willard, K. (2018, November 15). *More than 30 people knew of Nikolas Cruz's disturbing behavior but didn't report until after shooting, sheriff says*. CNN. <https://www.cnn.com/2018/11/14/us/parkland-commission-hearing-findings/index.html>.
- Smith, I. E. (2019, October 17). *Minority vs. Minoritized: Why The Noun Just Doesn't Cut It*. The Odyssey Online. <https://www.theodysseyonline.com/minority-vs-minoritize>.
- Snyder, K., Boldman, R., & Cocks, C. (2019). *CAS cross-functional framework for Identifying and Responding to Behavioral Concerns*. P. J. Carretta (Ed.). Washington, D. C.: Council for the Advancement of Standards for Higher Education.
- Snyder, R. L. (2020). *No visible bruises: what we don't know about domestic violence can kill us*. Scribe Publications.
- Souders, B. (2021, January 21). *17 motivational interviewing questions and skills*. PositivePsychology.com. <https://positivepsychology.com/motivational-interviewing/>.
- Staff, A. W. C. N. C. (2019, April 30). *Who is Trystan Terrell? UNCC shooting suspect facing multiple charges*. wcnc.com. <https://www.wcnc.com/article/news/who-is-trystan-terrell-uncc-shooting-suspect-facing-multiple-charges/275-21264198-c78c-4d47-a13d-f8a626c3b48c>.

- Thernstrom, M. (1997). *Halfway Heaven*. Doubleday.
- U.S. Department of Health and Human Services and U.S. Department of Education, Joint Guidance on the Application of the Family Educational Rights and Privacy Act (FERPA) And the Health Insurance Portability and Accountability Act of 1996 (HIPAA) To Student Health Records (2019).
- U.S. Department of Health and Human Services. (n.d.). *Autism spectrum disorder*. National Institute of Mental Health. Retrieved July 11, 2022, from <https://www.nimh.nih.gov/health/topics/autism-spectrum-disorders-asd>
- U.S. Department of Justice, Office of Community Oriented Policing Services. (2012). *Campus threat assessment case studies: a training tool for investigation, evaluation, and intervention*.
- University of Michigan. (2020). *The Healthy Minds Study - Fall 2020 Data Report*. Healthy Minds Network. <https://healthymindsnetwork.org/wp-content/uploads/2021/02/HMS-Fall-2020-National-Data-Report.pdf>.
- Virginia Tech Review Panel. (2009). *Mass shootings at Virginia Tech: addendum to the report of the review panel, presented to Governor Timothy M. Kaine, Commonwealth of Virginia*.
- Vossekuil, B., Fein, R., Reddy, M., Borum, R., & Modzeleski, W., *The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States*. U.S. Department of Education, Office of Elementary and Secondary Education, Safe and Drug-Free Schools Program and U.S. Secret Service, National Threat Assessment Center, Washington, D.C., 2002.
- Washington Post Staff. (2018, March 18). Red flags: The troubled path of accused Parkland shooter Nikolas Cruz. *The Washington Post*.
- White, S. G. (2017). Case Study: The Isla Vista Campus Community Mass Murder. *Journal of Threat Assessment and Management*, 4(1), 20–47.
- White, S. G., Meloy, J. R., Mohandie, K., & Kienlen, K. (2017). Autism spectrum disorder and violence: Threat assessment issues. *Journal of Threat Assessment and Management*, 4(3), 144–163. <https://doi.org/10.1037/tam0000089>
- Wondery. (n.d.). *Confronting Columbine*. <https://wondery.com/shows/confronting/>.