

IMPLEMENTING THREAT ASSESSMENT AND MANAGEMENT BEST PRACTICES IN THE HIGHER EDUCATION WORKPLACE

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By Jeffrey J. Nolan, Esq., Dinse, Knapp & McAndrew, P.C.,
(with contributions from Marisa Randazzo, Ph.D.
and Gene Deisinger, Ph.D).¹

Introduction

After the tragic shootings at Virginia Tech in 2007, many institutions of higher education developed threat assessment and management teams. With student-perpetrated attacks in mind, these teams often focused on ways in which institutions could better identify and intervene with

¹ Jeffrey J. Nolan is an attorney and partner at Dinse Knapp & McAndrew, P.C. in Burlington, Vermont. His litigation and counseling practice focuses on representing employers and institutions of higher education before courts and administrative agencies, advising them on employment and student-related matters, and assisting them in the development and implementation of policies and training programs. Jeff often does conference presentations, provides training, and consults with clients around the country regarding workplace violence prevention, threat assessment, and sexual violence prevention and response. In 2009, he participated as a subject matter expert in the development of the curriculum for a U.S. Department of Justice-funded program created by campus safety and security firm Margolis, Healy & Associates, "Campus Threat Assessment Training: A Multidisciplinary Approach for Institutions of Higher Education," and co-presented that training at 10 locations throughout the United States in 2009-2011. He regularly works as a consultant with Sigma Threat Management Associates (www.SigmaTMA.com) and Margolis, Healy & Associates (www.Margolis-Healy.com). Jeff can be reached at: jnolan@dinse.com, or through www.dinse.com.

Marisa Randazzo, Ph.D., is a Managing Partner of SIGMA Threat Management Associates and an international expert on threat assessment, targeted violence, and violence prevention. Before joining the private sector, Dr. Randazzo served for ten years with the U.S. Secret Service, most recently as the agency's Chief Research Psychologist. She is co-author of The Handbook for Campus Threat Assessment and Management Teams (2008) and lead author of Implementing Behavioral Threat Assessment on Campus: A Virginia Tech Demonstration Project (2009). Dr. Randazzo has been interviewed by an array of major television, radio, and print news outlets, including *60 Minutes*, *Nightline*, *Good Morning America*, the *Today Show*, the *Early Show*, *48 Hours*, *Dateline NBC*, MSNBC, the *New York Times*, and *National Public Radio*.

Major Gene Deisinger, Ph.D. is a Managing Partner of SIGMA and also serves as Deputy Chief of Police and Director of Threat Management Services for Virginia Polytechnic Institute and State University. He is a licensed psychologist, certified health service provider in psychology, and certified law enforcement officer. Dr. Deisinger developed the threat management program and served as the primary threat manager for Iowa State University from the team's inception in 1994, until his current position at Virginia Tech. Dr. Deisinger has managed threat cases and protective details for a broad range of governmental dignitaries, public figures, and members of the university community. Dr. Deisinger is lead author of The Handbook for Campus Threat Assessment & Management Teams and is a Fellow of the U.S. Department of Education Center for Alcohol, Drug Abuse, and Violence Prevention.

students of concern. Human resources personnel have not been involved universally with such teams, despite the recommendations of government reports and commentators. This should change, because staff and faculty may, like students and outsiders, pose threats to others on campus. Human resources personnel should be at the table to help threat assessment and management teams (“TAM teams”) to manage potential threats posed by employees through the employee assistance and disciplinary systems that are unique to the employment context.

Institutional efforts to enhance workplace violence prevention capacity may be supported by a document published in Fall, 2011 by ASIS International and the Society for Human Resource Management (“SHRM”). The document is an American National Standard titled: “Workplace Violence Prevention and Intervention” (“WVPI Standard”). SHRM’s involvement with the publication of the WVPI Standard is important, because SHRM is a resource that is well known to and trusted by human resources professionals on college and university campuses. The WVPI Standard provides helpful guidance for higher education and other employers that are seeking to implement and improve upon workplace violence prevention programs, threat assessment and management practices, and post-incident response protocols.

This article first provides some background information regarding workplace violence to illustrate that employees, like students and outsiders, may pose a threat of violence on campus. Second, the article discusses some workplace violence-related legal considerations. Third, the article summarizes the WVPI Standard’s suggestions regarding the development of a strong workplace violence prevention program. Finally, the article outlines the similarities between the threat assessment and management approach advocated in the Standard and that advocated by the Handbook for Campus Threat Assessment & Management Teams, which is also cited favorably in an ANSI standard.

I. Scope of the Problem

Statistics on workplace violence abound. Excellent resources are available from the U.S. Department of Justice's Bureau of Justice Statistics. A March, 2011 BJS Special Report, available at <http://bjs.ojp.usdoj.gov/content/pub/pdf/wv09.pdf>, notes that in 2009, approximately 572,000 nonfatal violent crimes (rape/sexual assault, robbery, and aggravated and simple assault) occurred against persons age 16 or older while they were at work or on duty, based on findings from the National Crime Victimization Survey. This accounted for about 24% of nonfatal violence against employed persons age 16 or older. According to 2009 preliminary data, 521 persons age 16 or older were victims of homicide in the workplace. Not surprisingly, police officers, security guards and bartenders were most at risk for nonfatal violence, but it is noteworthy that in about a third of workplace homicides from 2005-2009, the victim worked in a sales or office occupation. About 70% of workplace homicides were committed by robbers and other assailants, and 21% were committed by work associates, during the 2005-2009 period. It must be recognized, therefore, that no type of occupation or workplace is totally immune from the threat of workplace violence, and that while the highest percentage of cases involve strangers, a significant number involved known work associates.

Of course, data regarding threats and harassment in the workplace that do not result in actual violence (numbering into millions of incidences per year) indicate that such conduct is much more frequent than conduct involving actual, completed acts of violence. This is borne out by survey results gathered by the Northwestern National Life Insurance Company and the Bureau of Justice Statistics. Thus, even if, thankfully, institutions will not likely have to deal with acts of violence in your workplace, it is very likely that institutions will have to deal at some point with threatening or harassing behavior that has the potential to escalate.

II. Workplace Violence and the Law

While violence-related legal considerations are significantly less important than safety and prevention considerations, it is worthwhile to note some of the legal issues that may be implicated by workplace violence. In very general terms, individuals or employers ordinarily do not have a legal duty to prevent volitional, criminal acts by others, but there are exceptions to this general principle. In terms of common law duties toward employee victims, workers' compensation is usually the exclusive remedy for workplace death or injury, absent extraordinary, unique circumstances.

As to third parties injured by an employee, employers could have responsibility under what is known as "respondeat superior", if the conduct could be viewed in any reasonable sense as connected with the employee's job or a motivation to serve the employer. Negligent hiring and negligent retention theories may also be alleged by third parties, if an employer has failed to adequately vet employees in safety-sensitive positions, or to address troublesome behavior that it knew or should have known about. Various "special relationship" duties may also be cited, where the employer arguably has a relationship with the injured person or the person posing the risk such that it was in a position to reduce the risk of violence, or it has undertaken to provide protective services. The duties that institutions of higher education may have toward students are detailed in a 2011 URMIA Journal article titled "Campus Threat Assessment and Management Teams: What Risk Managers Need to Know Now," (which is available at: http://www.sigmatma.com/images/NolanRandazzoDeisinger_CampusThreatAssessmentTeams_FINAL_20110802.pdf), and in an article titled "Campus Threat Assessment and Management Teams in 2012: Current Standards of Care and an Outline of Best and Promising Practices, which is available to NACUA members at:

http://www.nacua.org/securedocuments/programs/june2012/08f_v-12-06-17.pdf. Suffice it to say that while employer liability for acts of workplace violence is by no means assured, there are enough legal theories available that a lawsuit, if not liability, is possible if a violent incident occurs in your workplace.

In terms of statutory duties, the federal Occupational Safety and Health Administration (“OSHA”) has not adopted specific, generally-applicable standards regarding workplace violence prevention. OSHA will, however, cite employers for workplace violence-related violations of OSHA’s “general duty” clause, in cases where an employer fails to “furnish . . . a place of employment which [is] free from recognized hazards that are causing or likely to cause death or serious physical harm.” Foreseeable workplace violence can be a “recognized hazard” for OSHA purposes.

OSHA has published specific guidelines on promoting safety for health care and social service workers (see <http://www.osha.gov/dte/library/wp-violence/healthcare/index.html>) and for late night retail workers (see <http://www.osha.gov/Publications/osha3153.pdf>). Even outside the health care/social service worker context, an employer auditing its workplace violence prevention efforts should review the health care/social service guidelines. While many of the details of the guidelines are most applicable in the health care/social service contexts, the guidelines provide a useful organizational outline of areas that should be considered. Areas of focus recommended by the guidelines include: management commitment and employee involvement; worksite analysis (including by a threat assessment team); hazard prevention and control; training and education for employees, and recordkeeping and evaluation of the program. Of course, employers operating outside the health care/social service contexts should only adopt those elements of the guidelines as meet their needs.

More recent guidance is also provided by OSHA's September, 2011 "Enforcement Procedures for Investigating or Inspective Workplace Violence Incidents," which is available at http://www.osha.gov/OshDoc/Directive_pdf/CPL_02-01-052.pdf. Institutions should review this guidance when assessing their workplace violence and intervention efforts.

III. Developing a Workplace Violence Prevention and Intervention Program

The WVPI Standard appears based on its prefatory sections to be the result of a collaborative effort between ASIS International, an organization for security professionals, and SHRM. The WVPI Standard is labeled "an American National Standard" by ANSI. ANSI publishes safety-related standards on a wide range of topics, from consumer product safety to broad-based institutional risk management. It is worth noting, when assessing the currency and weight of the WVPI Standard, that courts routinely allow evidence and arguments to the effect that ANSI standards are informative, if not determinative, of the standards of care that should apply in various contexts. The WVPI Standard is available from the ASIS web site for a modest charge (see <http://www.asisonline.org/guidelines/published.htm>).

The WVPI Standard is organized into several sections. The first few sections deal with the scope of the Standard and definitions. The remaining seven sections deal with: 1) establishing multidisciplinary involvement of key workplace stakeholders; 2) planning a workplace violence prevention and intervention program; 3) implementing the program; 4) threat response and incident management; 5) the role of law enforcement; 6) integrating the issue of intimate partner violence into workplace violence prevention strategies; and 7) post-incident management. This portion of this article will summarize the main themes of the first two sections of the Standard, and suggest how institutions can integrate the Standard's guidance into their workplace violence prevention and intervention efforts.

Establish multidisciplinary involvement.

In order for an institution to create a strong workplace violence prevention culture, it is crucial that all key stakeholders understand the general message of the Standard's first substantive section: workplace violence prevention is not the exclusive province of an institution's public safety, HR, legal, management, or counseling personnel. Instead, sound prevention systems take a multidisciplinary approach, and draw from the expertise and experience of practitioners in each of these fields, and others as appropriate. The Standard emphasizes first and foremost that top management must be committed to the workplace violence prevention program, in order to ensure that the importance of the effort is understood throughout the organization, and that adequate resources will be made available for the creation and implementation of the program. Human resources personnel are mentioned next in the Standard as commonly playing a central role in establishing an employer's program and policies, coordinating related training, participating in incident management as necessary, and enforcing anti-violence policies through the employer's disciplinary procedures. The Standard also recognizes the reality that employees often address concerns about threatening statements, behaviors, or violence to human resources. Clearly, HR professionals should play a crucial, and often a coordinating, role in workplace violence prevention efforts.

Not surprisingly, the Standard next profiles the role of security professionals in violence prevention efforts. Obviously, institutions of higher education have an advantage over many other types of employers because they have sworn or non-sworn security professionals on site full time, and can utilize their expertise in planning for and dealing with the management of potentially violent incidents, receiving complaints and concerns, interacting with outside law enforcement as necessary, etc.

The Standard next emphasizes the roles that legal counsel--whether in-house or from an outside law firm--should play in ensuring that the employer has met any legal requirements related to violence prevention, and that the employer's anti-violence-related policies and procedures are appropriate. The Standard also notes that counsel should help the employer navigate the numerous legal issues that arise during threat or incident management, such as issues related to: employee privacy rights; compliance with the employer's disciplinary and other personnel policies or bargaining agreements; application of Americans with Disabilities Act requirements in situations involving employee misconduct; due process requirements; background check-related laws; evidence preservation; investigation techniques; appropriate disciplinary or other remedial steps; and weighing the legal risks and potential liabilities inherent in various courses of action. The Standard concludes that "[u]ltimately, legal counsel brings critical expertise to its role within an interdisciplinary team."

Next, the Standard covers the roles that occupational safety and health personnel, union leaders, employee assistance program personnel, crisis/risk management personnel, and public relations personnel should play. The substance of the Standard's comments is generally consistent with a common-sense understanding of how these professionals would contribute to planning for and managing workplace violence issues or threatening behavior.

One point of particular interest should be made, though, regarding employee assistance or counseling professionals. Absent an agreement to the contrary, licensed counseling professionals generally have an obligation to keep confidential information they might learn from employees in the course of a privileged counseling relationship. In many states, however, such professionals also have a countervailing duty to breach confidence and take steps to warn or otherwise initiate protection for foreseeable victims, if they determine that a patient poses a

serious (and in many states, imminent) risk of danger to another. In other states, while a duty may not be imposed by statute or court decision, such professionals may be permitted (though not required) to breach confidence in such situations. In implementing workplace violence prevention protocols, institutions should meet with EAP personnel and/or other counseling professionals with whom they are likely to deal regularly, and have detailed, scenario-based conversations regarding what rules apply in the jurisdiction, and what level of risk needs to be present for such professionals to make such disclosures. If all parties can be on the same page regarding these issues in advance, they can avoid a potentially dangerous misunderstanding about when warnings might be received, and can work out a shared understanding in the abstract, rather than attempting to do so in the middle of an emergent situation.

Again, the theme of the Standard's first substantive section is that responsibility for a strong workplace violence prevention program must be shared among members of a multidisciplinary team, which receives support and a commitment of necessary resources from the top of the organization.

Plan a workplace violence prevention and intervention program.

The second substantive section of the WVPI Standard describes steps that could be taken to plan a prevention and intervention program. The Standard counsels starting with a general needs assessment that assesses the employer's general vulnerability to violence, its current prevention and intervention practices, and its physical security measures and vulnerabilities. The Standard contains helpful "checklist"-style suggestions for doing a gap analysis regarding policies, training programs and other practices related to these areas. Next, the Standard suggests that the employer's formal workplace violence prevention policy should be reviewed and, if necessary, revised. The Standard suggests numerous elements that could be incorporated

in such a policy, and suggests review and revision of supplementary, related, policies, such as policies regarding harassment and discrimination, substance abuse, business conduct and ethics, electronic communications, and the inspection of employee-used computers, workspaces and premises. Of course, institutions of higher education must tailor policies to the unique circumstances of their culture and workplace, but the policy suggestions in the Standard are a good place to start when developing an inventory of related policies that should be reviewed.

Develop an interdisciplinary threat management team.

The Standard next emphasizes that strong workplace violence prevention programs will include an interdisciplinary threat assessment and management team that is created and trained² to respond to violent incidents and reports of troubling behavior. The Standard notes that such teams will typically include HR, security and legal personnel in most cases, and other personnel as listed above where appropriate. The Standard also encourages the “identification of qualified external resources that the Team can call upon as needed to assist with incident management, where the organization lacks the expertise in-house.” The Standard notes that in particular, organizations faced with threatening behavior “commonly will engage a violence risk assessment expert” who can conduct a formal violence risk assessment if necessary, and “often will need to consult with an outside employment law attorney who can provide advice regarding the many legal issues that commonly arise during incident management.” Finally on this point, the

² When planning TAM team training efforts, college and university counsel should take advantage of a resource published recently by the Department of Justice’s Office of Community Oriented Policing Services (“COPS”), titled: “Campus Threat Assessment Case Studies: A Training Tool for Investigation, Evaluation and Intervention.” This guide was developed by Gary J. Margolis, Ed.D. and Steven J. Healy of Margolis, Healy & Associates, Jeffrey J. Nolan, Marisa Randazzo, Ph.D., and Annie Stevens, Ed.D. (who is the Assistant Vice President for Student Affairs at the University of Vermont), as part of a COPS Office-funded campus threat assessment project described at www.campusthreatassessment.org. A TAM team’s use of the guide should enhance the effectiveness of table-top training exercises, because the guide integrates hypothetical threat assessment and management case studies with the key inquiry questions from the Deisinger and Randazzo “Handbook for Campus Threat Assessment and Management Teams” discussed below. The guide is available at: http://www.margolishealy.com/resources/?utm_source=Margolis+Healy+Training+Tool+Released+by+COPS&utm_campaign=COPS+Threat+PDF+2013&utm_medium=email.

Standard emphasizes that appropriate use of threat assessment, security and legal experts with relevant experience can also be significantly helpful in the program development stage. Larger institutions of higher education may be in a better position than other employers to have some of these capacities in-house given the relative breadth of their operations.

IV. The Threat Assessment and Management Process: Common Themes and Practices

As background for the following discussion, it should be emphasized that research has shown that perpetrators of serious, targeted violence do not just “snap”. Certainly, instances of impulsive, affective violence do occur in heated situations, but research has shown that very serious targeted attacks and murders more commonly involve advance planning on the part of the perpetrator. Most consider, plan, and prepare before engaging in violent or destructive behavior, and most discuss their plans with others beforehand. Research has also shown that most are suicidal, and/or at a point of desperation, before targeted attacks. Again, these data have implications for prevention efforts. They show that incidents of workplace violence can be prevented in some cases, because information about a person’s ideas and plans for harm can be observed or discovered in advance. The problem is that available information is likely to be scattered, and that “leakage” of clues may occur by various means. Therefore, TAM teams need to act quickly upon an initial report of concern, see who else has a piece of the puzzle, then assemble the information to see what picture emerges.

The following portion of this article compares the threat assessment and management approaches advocated by the WVPI Standard and the “Handbook for Campus Threat Assessment and Management Teams” (ARM 2008) (“TAM Handbook”), which is available at http://www.tsgsinc.com/products_campus_security_handbook.html. The TAM Handbook should be considered not only because it was written specifically for the higher education

context, but also because it was recommended as a resource in “A Risk Analysis Standard for Natural and Man-Made Hazards to Higher Education Institutions,” which was published by the ASME Innovative Technologies Institute, LLC, and approved by the American National Standards Institute, in 2010. The WVPI Standard and TAM Handbook advocate similar approaches, which should give some confidence to campus TAM teams that employ the general principles outlined therein in assessing and managing potential workplace violence risks.

First things first: Is this an emergency situation?

The TAM Handbook and the WVPI Standard are consistent in recommending that a TAM team’s or management employee’s first duty when receiving information about concerning behavior is to determine and decide quickly whether an imminent threat or emergency may be posed. In light of timing issues, this determination will have to be made based upon readily-available information, such as the initial report and any background information that members of the team or quickly-available resources happen to have. If it is determined that the situation may be an emergency, then campus public safety and/or law enforcement needs to be contacted, and crisis management/physical safety measures need to be implemented, immediately. The team will eventually need to conduct a full threat assessment inquiry to take appropriate measures in the event the person in question is released from custody, but in the event of an emergency or imminent situation, the team’s primary course of action is to notify public safety/law enforcement to ensure the situation is contained. Once the immediate risk is contained, the more advanced threat assessment steps outlined below can proceed, tailored as necessary given the circumstances and considerations such as whether the person of concern is in law enforcement custody or is otherwise confined involuntarily.

Second step: Initial Data Gathering and Risk Screening by the TAM Team

If the TAM Team determines that there is not an emergency or imminent concern, the team should next do initial data gathering and risk screening. It is important for institutions to recognize that this should also be done in situations where the person of concern has been removed from the workplace by law enforcement through a criminal law or involuntary hospitalization process, if it appears that the person will be released from custody in the near future. The WVPI Standard distinguishes this step, which again is conducted by the TAM team, from “a more elaborate process performed by specifically qualified [threat assessment] personnel.” The purpose of this step is to “assist the Team in determining the general urgency of a situation and appropriate initial actions to take.”

In this step, the TAM team should seek out readily-available information from persons and other sources that may have some information about the person of concern. This information-seeking process is crucial, and distinguishes the work of TAM teams from other less active human resources-related workplace functions. The WVPI Standard advises that sources of initial information can include:

- employees who reported the conduct of concern, or who are potential targets of the behavior;
- where an employee is the person of concern: i) current and former supervisors of the person; ii) the most closely-associated HR professional; iii) the employee’s personnel file; iv) the employee’s workplace computer, e-mail account and other electronic communications and Internet usage history (hopefully, you have made clear by policy that employees should have no expectation of privacy in such hardware and information); all communications by the employee that have generated concern;

- where a third party is the person of concern: i) all communications received from the person; ii) a criminal background check, if possible; and

- publicly-available information about the person of concern, such as information available through Google, Facebook, YouTube, etc.

The WVPI Standard cautions that “a formal violence risk assessment shall be conducted solely by specifically qualified and credentialed personnel or outside consultants, [institutions of higher education may, again, have such capacity in-house]” but notes that in doing the initial data gathering, a TAM team could inform its preliminary triage work by focusing on key questions such as the following in order to gain some insight into whether an increased risk of violence may be present:

- what appears to be motivating the person of concern to make the statements or take the actions of concern?

- what has the person of concern communicated concerning his or her intentions?

- what interest, if any, has the person shown in violence or its justification, violent perpetrators, weapons, or extremist groups?

- has the person engaged in planning and preparation for violence, such as approaching a target or site, breaching security, or monitoring, harassing or stalking a target?

- does the person have a known or suspected current or past history of a mental illness or substance abuse? Has the person exhibited symptoms of paranoia, delusional ideas, hallucinations, extreme agitation, despondency or suicidal tendencies (especially with any violent content)? Has he or she ever acted on such beliefs?

- what evidence exists of serious oppositional or counterproductive attitudes or behavior in the workplace (e.g., unjustified blaming of others, a strong sense of entitlement, defensiveness, intolerance of others' rights)?

- how does the person manifest his or her anger and how focused is this anger on individuals in the workplace?

- has the person experienced (or is he or she likely to experience in the near future) any serious personal or financial stressors (e.g., job or status loss, divorce, custody disputes, deaths in family)? Does he or she show poor coping skills in reaction to such events?

- what is the person's known history of serious interpersonal conflict, violence, or other criminal conduct (in domestic or other settings)?

- is there evidence of any organizational, supervisor, or work group problems that have contributed to or provoked the behavior/statements of concern, and how do those problems influence the individual's perception of his or her circumstances?

The WVPI Standard also notes that key questions aimed at disclosing factors that may lower or mitigate the risk of violence include the following:

- does the person of concern have valued family or other positive personal attachments?

- has the person expressed genuine remorse for making threats or engaging in the behavior of concern?

- has the person responded positively to defusing or limit-setting efforts by others?

- has the person engaged in appropriate problem solving or sought professional treatment or legal recourse as a way to manage a precipitating stressful situation?

- what services have been offered to the individual, and which have been accessed positively?

The WVPI Standard recognizes that answers to many of these questions may not be available initially or at all, so this should serve as a list of suggested areas of inquiry where practical, and not as a “punch list” that must be completed exhaustively in every case. The Standard also cautions that TAM teams should consult with legal counsel regarding the information-gathering process, to ensure compliance with applicable laws (and, it should be noted, institutional policies).

Third Step: Evaluate Information for the Initial Risk Screening

The WVPI Standard advises that once it gathers initial information, the TAM team should evaluate, from a lay perspective, the information that it has been able to gather.

Questions asked in this evaluation should include:

- 1) is a concern for violence unwarranted, so that the individual can be handled within normal HR, disciplinary, or employee relations protocols, and not through a TAM process?
- 2) is some concern for violence warranted but not significant or urgent, so that the TAM team can continue with additional fact gathering and its incident management processes?
- 3) is a concern for violence present at a level that consultation with law enforcement and/or a violence risk assessment professional is warranted?

If the team concludes that the situation falls within categories 2) or 3) above, it should retain a connection to the case and initiate case/threat management efforts.

Fourth step: Formal Threat Assessment/Threat Management

To facilitate understanding and for the purposes of this article, a description of the formal threat assessment and threat management will be combined here into a fourth step. Threat assessment is a fluid process and an individual’s risk for violence may ebb and flow over time, so threat assessment and threat management activities will often be intertwined in practice.

In terms of threat management, the WVPI Standard suggests, in addition to the retention or utilization of a threat assessment professional and legal counsel, that the TAM team can:

- continue or expand information collection efforts;
- assess the need for additional physical security;
- initiate coordination with local law enforcement;
- work with HR to conduct employment actions such as discipline, suspension, or termination, referral to EAP, administrative leave, etc. (while recognizing that termination alone does not guarantee safety and may actually increase the risk violence, as discussed below);

- when the person of concern is an employee who appears to be suffering from a mental illness, consult with legal counsel to determine the employer's obligations and rights under the ADA (the details of this will be discussed in a subsequent article);

- when the person of concern is a third party, consider professional surveillance efforts (within legal parameters);

- work with counsel to initiate necessary and appropriate legal action (such as restraining or protective orders or no-trespass notices) if after careful evaluation and consultation with a threat assessment professional it is determined that such action will actually enhance, rather than diminish overall threat management efforts (if not well conceived, such action can precipitate rather than minimize threatening behavior).

The TAM Handbook advises similarly that in the threat management phase, the TAM team should develop, implement, monitor, and document a plan to intervene and reduce the threat. The plan should be customized to best address the person of concern and situation with the resources that the team and institution has available or could access or coordinate. The goal of a threat management plan is to help move the person of concern away from thoughts and plans

of violence/suicide and get assistance to address problems. Dr. Randazzo and Dr. Deisinger advise that threat management plans can include any of the following, as well as other options, as the situation and resources dictate:

- Monitor the situation for further developments;
- Engage with the person of concern to de-escalate the situation;
- Involve an ally or trusted person to monitor the person of concern;
- Family notification;
- Law enforcement intervention;
- Disciplinary review and action;
- Implement a behavioral contract;
- Voluntary referral for mental health evaluation and/or treatment;
- Mandated psychological assessment;
- Involuntary hospitalization for evaluation and/or treatment;
- Leave or separation from the employer (voluntary or involuntary);
- Modification of the environment to mitigate impact of contributory factors;
- Collaborate with identified target/victim to decrease vulnerability; and/or
- Monitor and prepare for impact of likely precipitating events.

The TAM Handbook emphasizes that once the TAM team has created a threat management plan, it is just as important that the team document the plan, implement the plan, and then monitor how well the plan is working—to make sure it is having the intended effect and not inadvertently making the situation worse.

It is important to note that a former employee can continue to pose a threat even if or after he/she is no longer connected with the institution. The TAM Handbook advises that the

TAM team should continue to monitor the plan, and modify it as needed, for as long as the person/situation may still reasonably pose a threat. It may be necessary for the TAM team to continue to refer the person of concern to necessary resources and/or take other follow-up steps as the situation and level of concern dictate. As the TAM team considers what may affect the person's behavior in the short, mid- and long-term, the team should anticipate the impact of future precipitating events; i.e., important dates or events—such as anniversaries, termination of benefits, formal termination of employment, or the occurrence of mass attacks elsewhere—that could prompt the person to become an increased threat. The team should develop contingency plans and take necessary steps to reduce or mitigate the anticipated threats.

Step Five: Close and Document the Case

The TAM Handbook emphasizes that cases handled by a TAM team generally remain open until the person of concern no longer appears to pose a threat. This may be well beyond when criminal cases are closed (or even dismissed, as an institution's internal process should not depend on the outcome of any criminal justice process) or mental health services are completed. Whether the case remains open or is closed, the TAM team should document how it handled the case, to include the report that first came to the team's attention, the information the team gathered, the evaluation it made, the case management plan it developed and implemented (if necessary), and any re-evaluations or monitoring that the team conducted after the initial evaluation and case management efforts (where relevant). Such documentation is very sensitive given the potential risks involved, so the TAM team should work with legal counsel regarding documentation and inter-team information-sharing issues.

Conclusion

Publication of the WVPI Standard, and its connection to SHRM, should support the efforts of institutions of higher education to ensure that their TAM teams are as adept at assessing and managing potential threats posed by employees as they are at assessing and managing potential threats posed by students. If institutions plan thoughtfully, obtain appropriate training, and utilize professional resources where necessary, they can better address the broad range of risks posed by employees, students and third parties on their campuses.