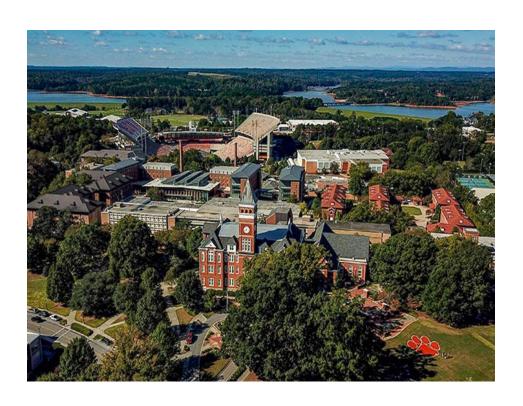


Threat Assessment Procedures For Clemson University



Effective February 2022

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Introduction

The threat assessment policies, procedures, and guidelines contained herein were developed based on models created by the Virginia Department of Criminal Justice Services (DCJS) along with policies and procedures based on a synthesis of known best practices and are consistent with two significant sources of guidance:

Fein, R. A., Vossekuil, B., Pollack, W. S., Borum, R., Modzeleski, W. & Reddy, M. (2004). *Threat assessment in schools: A guide to managing threatening situations and to creating safe school climates.* Washington, DC: U. S. Secret Service and U. S. Department of Education.

Deisinger, G., Randazzo, M., O'Neill, D., and Savage, J. (2008). *The handbook for campus threat assessment & management teams*. Boston, MA: Applied Risk Management, LLC.

Section I. Student and Staff Threat Assessment

A. Procedure on Student, Staff, Faculty Threat Assessment

Purpose: The purpose of this procedure is to establish guidelines for the review and assessment of actual and potential threats reported to University officials. Clemson University workplace violence policy applies to all acts or threatened acts of workplace violence on property owned or leased by or under the control of Clemson University or at Clemson University sponsored events, wherever located.)

Definitions

Threat – Communication or behavior that suggests a person may intend to harm someone else. The threat may be spoken, written, or gestured, and is considered a threat regardless of whether it is observed or communicated directly to the target of the threat or observed by or communicated to a third party and regardless of whether the target of the threat is aware of its existence in any fashion.

Threat assessment – A fact-based process relying primarily on an appraisal of behaviors to identify potentially dangerous or violent situations and address them.

Threat assessment team (TAT) – a group of individuals employed by or associated with Clemson University who work together to determine the level/severity of each reported potential threat. Members include university administrators with executive-level authority, a licensed professional counselor (LPC), a sworn law enforcement officer, and appropriate others.

B. Procedures for Conducting Student, Staff and Faculty Threat Assessments

1) Identifying Threats

There are many behaviors on any university campus that may cause concern for the safety and well-being of an individual or the campus as a whole. The following is not an exhaustive list but provides examples of concerning behaviors or situations. No single behavior or group of behaviors may cause an intervention by University officials responsible for such action; however, may be cause for review and assessment.

- Unusual or abrupt changes in behaviors or patterns;
- Extreme reaction to a loss or traumatic event;
- Preoccupation with weapons, violent events, or persons who have engaged in violent acts;
- Uncharacteristically poor performance, grooming, or affect;
- References to harming others or planning a violent or destructive event;
- Evidence of depression, hopelessness, or suicidal thoughts/plans;

- Inappropriate responses such as prolonged irritability, angry outbursts, or intense reactions;
- Strained interpersonal relations, isolating behaviors, or low self-esteem;
- Following or stalking, in person or electronically;
- Significant change in life circumstances such as loss of job or relationship.

2) Reporting Potential Threats

Anyone who believes that a person or situation poses a clear and immediate threat of serious violence that requires containment should notify Clemson University Police (864-656-2222) or in the case of emergencies, dial 911. Notwithstanding any other provision in this procedure, the Clemson University Police retain the authority to respond to reported threats and crimes immediately without first consulting with the Threat Assessment Team.

For any non-emergent threat not requiring immediate intervention, Clemson University Police will collaborate with the co-chairs of the Threat Assessment Team (TAT). The TAT in conjunction with the University's Behavioral Intervention Team (BIT) will determine the immediacy of the threat and appropriate interventions. If behavioral intervention is sufficient, the TAT will refer the case to BIT. Otherwise, the procedures outlined will be followed.

While anonymous reports are accepted, it is important that individuals making reports share as much information as possible. The identity of the reporter allows TAT members, and/or local law enforcement to gather additional facts and conduct follow-up interviews. Identities will be protected to the fullest extent possible.

3) Assessing Threats

When a threat is reported, unless it is referred to the Behavioral Intervention Team (BIT), the co-chairs of the Threat Assessment Team (TAT) will convene the TAT and begin the assessment process.

a. Initial Screening

The initial screening consists of the TAT co-chairs, VP of Student Affairs, and Associate VP for Public Safety, receiving a full report from the person identifying the threat. The goal of the screening is to gather as many details as possible to determine immediacy and level of threat.

b. Immediacy/Imminence

When the initial screening identifies an immediate threat, the TAT will make the appropriate notification to law enforcement.

When the threat does not appear imminent, the TAT co-chairs, VP for Student Affairs, and Associate VP for Public Safety, will triage the situation. Two results are expected in this step: (1) a determination as to what, if any, intervention is required now; and (2) a decision as to whether a full inquiry is warranted. If immediate interventions are not likely to resolve the concern, the TAT will be convened to conduct a full inquiry. Conversely, if immediate interventions are

warranted and likely to bring resolution to the concern, a full TAT inquiry will not be conducted. For example, when a student threatens self-harm and is referred to BIT, the TAT assumes that the BIT group will seek sufficient resources (counseling, temporary detention order, etc.) to resolve the concern. If the matter involves an employee, Associate VP for Human Resources and other TAT co-chair will make the necessary referral regarding employment impact based on available resources and current protocols.

c. Inquiry and Assessment

If it is determined that some level of threat exists, warranting an inquiry and assessment, the TAT will use this procedure to determine the level of threat that exists and subsequent action or monitoring needed.

D. Student and Employee Discipline

The TAT does not discipline students or employees. All University policies and procedures surrounding student conduct and employee conduct will be followed during the TAT assessment. Members of the Office of Conduct and Ethical Standard and Human Resources will be core members of the TAT. Any potential disciplinary matter will be referred to the appropriate office.

Section II. General Threat Assessment

A. Procedure on General Threat Assessments

Clemson University workplace violence policy applies to all acts or threatened acts of workplace violence on property owned or leased by or under the control of Clemson University or at Clemson University sponsored events, wherever located. General threats are those that come from individuals or groups not affiliated with the university. These individuals or groups may be visitors, vendors, contractors or contract employees, or individuals who may have targeted the university or one of its stakeholders.

B. Procedure for Conducting General Threat Assessments

The Threat Assessment Team (TAT) will take one of two courses of action with regard to conducting threat assessments for general threats. In situations where an individual is identified, appears to be acting alone, and poses a Priority 3 (Threat Levels are defined below) or lower risk to the university, the TAT will follow the procedures established in this procedure.

In situations where the scope of the threat is unknown or the threat posed is higher than Priority 3 (disruption), the university will follow the protocol outlined by CUPD. The TAT will work in conjunction with CUPD and provide follow up monitoring to management any intervention strategies required to mitigate the threat.

Section III. Resources

A. Threat Assessment Guidelines and Flow Chart

The threat assessment processes at Clemson consist of three (3) parts: (1) adherence to the *Guiding Principles*; (2) assessing and classifying threats; and (3) follow up.

Guiding Principles

The appraisal of risk in a threat assessment focuses on actions/behaviors, communications, and specific circumstances that might suggest that an individual intends to engage in violence and is planning or preparing for that event. The threat assessment process is centered upon an analysis of the facts and evidence of behavior in a given situation.

Six core principles form the foundation of the threat assessment process at Clemson University:

- 1. The central question in any threat assessment inquiry or investigation is whether an individual (student or other) poses a threat, not whether the individual has made a threat.
- 2. Targeted violence is the end result of an understandable, and often discernible, process of thinking and behavior.
- 3. Targeted violence stems from an interaction among the individual, the situation, the setting, and the target.
- 4. An investigative, skeptical, inquisitive mindset is critical to successful threat assessment.
- 5. Effective assessment is based on facts and observations of behavior, rather than on characteristics or traits.
- 6. An integrated approach should guide threat assessment inquiries. (Coordination with the university's Behavioral Intervention Team, other institutions, and other agencies such as mental health services and law enforcement is an important practice for gaining a comprehensive understanding of the potential threat.)

Assessing and Classifying Threats

Based on the information available, the threat assessment team should seek to answer the following questions:

- 1. What are the individual's motives and goals?
 - a. What motivated the individual to make the statements or take the actions that caused him/her to be reported?
 - b. Does the situation or circumstance that led to these statements or actions still exist?
 - c. Does the individual have a major grievance or grudge? Against whom?
 - d. What efforts have been made to resolve the problem and what has been the result? Does the potential attacker feel that any part of the problem is resolved or see any alternatives?

- 2. Have there been any communications suggesting ideas or intent to attack?
 - a. What, if anything, has the individual communicated to someone else (targets, friends, other students, teachers, family, others) or written concerning his/her ideas and/or intentions? (Written documents may include assignments submitted in Clemson course and postings on social media sites, as examples.)
 - b. Have friends been alerted or "warned away?"
- 3. Has the subject shown inappropriate interest in any of the following?
 - a. School attacks or attackers
 - b. Weapons (including recent acquisition of a weapon)
 - c. Incidents of mass violence
- 4. Has the subject engaged in attack-related behaviors? These behaviors might include:
 - a. Developing an attack idea or plan
 - b. Making efforts to acquire or practice with weapons
 - c. Casing, or checking out, possible sites and areas for attack
 - d. Rehearsing attacks or ambushes
- 5. Does the individual have the means to carry out an act of targeted violence?
 - a. How organized is the individual's thinking and behavior?
 - b. Does the individual have the means (access to a weapon, for example) to carry out an attack?
- 6. Is the subject experiencing hopelessness, desperation, and/or despair? (BIT should be consulted on this question.)
 - a. Is there information to suggest that the individual is experiencing desperation and/or despair?
 - b. Has the individual experienced a recent failure, loss, and/or loss of status?
 - c. Is the individual known to be having difficulty coping with a stressful event?
 - d. Is the individual now, or has he/she ever been, suicidal or "accident prone?"
 - e. Has the individual engaged in behavior that suggests that he/she has considered ending his/her life?
 - f. Has the individual been known to practice self-harm?
- 7. Does the individual have a trusting relationship with at least one responsible adult?
 - a. Does the individual have at least one relationship with an adult that he/she can confide in, believing that he/she will be heard in a non-judgmental way?
 - b. Is the individual emotionally connected to others? Is he/she emotionally disconnected from others?
 - c. Has the individual previously come to someone's attention or raised concern in a way that suggests he/she needs intervention or supportive services?

- 8. Does the subject see violence as an acceptable (or desirable or only) way to solve problems?
 - a. Does the setting around the individual (friends, fellow students, colleagues, parents, teachers, spouses, etc.) explicitly or implicitly support or endorse violence as a way of resolve problems or disputes?
 - b. Has the individual been "dared" by others to engage in an act of violence?
- 9. Are the individual's conversation and story consistent with his/her actions? Does the information from collateral interviews and from the individual's own behavior confirm or dispute what the individual says is going on?
- 10. Are other people concerned about the individual's potential for violence?
 - a. Are those who know the subject concerned that he/she might take action based on violent ideas of plans?
 - b. Are those who know the subject concerned about a specific target?
 - c. Have those who know the subject witnessed recent changes or escalation in mood and behavior?
- 11. What circumstances might affect the likelihood of an attack?
 - a. What factors in the individual's life and/or environment might increase or decrease the likelihood that the person will attempt to mount an attack at the university?
 - b. What is the response of other people who know the subject's ideas or plan? Do those who know the subject's ideas actively discourage the individual from acting violently, encourage the subject to attack, deny the possibility of violence, passively collude with an attack, etc.?

Follow-Up

Follow-up activities usually follow one of two forms: (1) referral; and/or (2) monitoring.

B. Referral

For threat assessment purposes, referral means placing further investigation, monitoring, and intervention within the sphere of responsibility of another body. The most common referrals are those to the university's Behavioral Intervention Team (BIT). BIT referrals are made for Priority 3 and 4 cases (as deemed appropriate by the TAT) for intervention and monitoring. The BIT may, at its discretion, transfer the case back to TAT should an escalation be deemed present.

The second most common referral is to an external agency when circumstances require immediate intervention. Individuals who volunteer for self-evaluation will be transported to an appropriate medical facility for evaluation.

Individuals who will not willingly self-commit and voluntarily seek intervention may be referred to CUPD or local law enforcement (usually the Pickens County Sheriff's Office).

C. Monitoring

Monitoring plans are created for all Priority 1-4 risks where circumstances warrant. Monitoring plans should identify the primary caseworker (person responsible for ensuring that the monitoring plan is carried out), specific steps that will be taken to monitor the situation including the use of all appropriate resources available across campus, and a timeline associated with those steps.

D. Documentation

The co-chairs of the Threat Assessment Team (TAT) are responsible for ensuring that all appropriate documentation of the TAT's assessment – including contributing documents like incident reports and interviews – are part of the official record. A *Threat Assessment and Response Report* form (below) should be completed with each assessment.

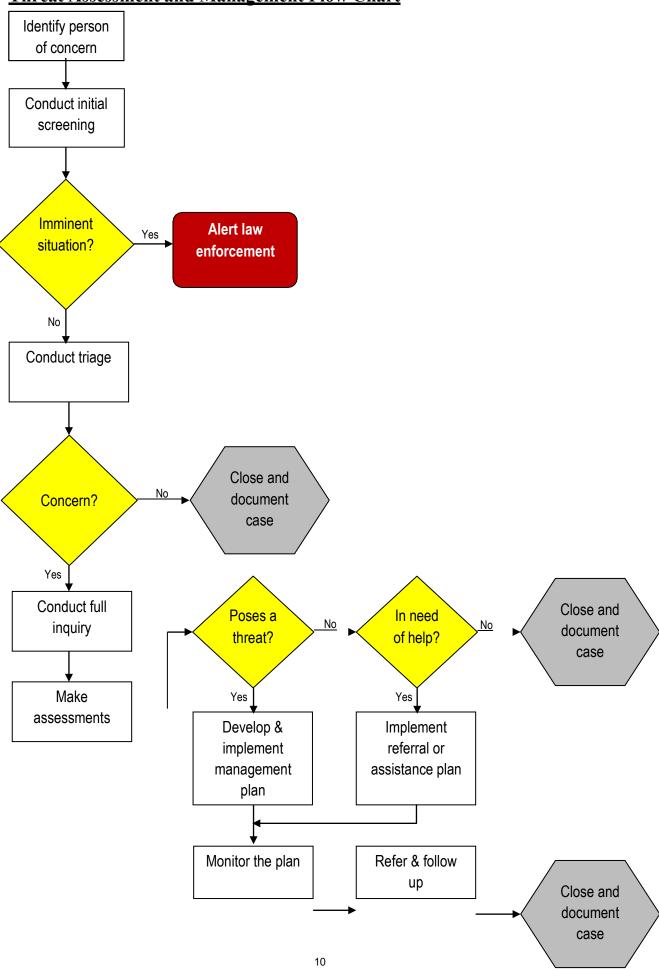
E. Deviation from Procedures

These procedures provide guidance to administrators handling potential threats to the university community. However, every threat assessment is unique and usually time sensitive. Clemson University reserves the right to deviate from these procedures as needed under the circumstances.

These and other questions, once considered thoroughly by the TAT, should lead to a classification of the threat as follows:

Threat Level	TAT Response
Priority 1 (Imminent/Critical)	The person/situation appears to pose a clear and imminent threat of serious violence toward self or others and requires containment.
	TAT should contact law enforcement to pursue containment options and/or protect identified target(s).
	Once containment action has been taken, the TAT will develop and implement a management and monitoring plan.
Priority 2 (High)	The person/situation appears to pose a threat of self-harm or physical violence, usually to an identifiable target, but currently lacks immediacy and/or a specific plan – or a specified plan of violence does exist but currently lacks a specific target. TAT develops a monitoring plan.
Priority 3 (Moderate)	The person/situation does not appear to pose a threat of violence or self-harm at this time but does exhibit behaviors/circumstances that are likely to be disruptive to the community.
	This case warrants intervention, usually by the Behavioral Intervention Team (BIT), to include referral and/or monitoring to minimize the risk of escalation. TAT develops a monitoring plan.
Priority 4 (Low)	The person/situation does not appear to pose a threat of violence or self-harm at this time, nor is there evidence of significant disruption to the community. TAT maintains report for potential re-examination in the future and contacts BIT (if appropriate) for referral and monitoring.
Priority 5 (No Identified Risk)	The person/situation does not appear to pose a threat of violence or self-harm at this time, nor is there evidence of significant disruption to the community. TAT closes the case.

Threat Assessment and Management Flow Chart



ACTION GUIDE FOR FACULTY & STAFF

Frequently Asked Questions About Dealing with Student Behaviors

Q. What is the mission of the Threat Assessment Team?

Clemson University's Threat Assessment Team will help develop policies and procedures for the prevention of violence on campus, including assessment and intervention with individuals or groups whose behavior poses a threat to the safety of the campus community.

Q. What are some signs that a student may be in distress?

Students in distress may not be disruptive to others, but may exhibit behaviors which indicate something is wrong, show signs of emotional distress and indicate that assistance is needed. They may also be reluctant or unable to acknowledge a need for personal help. Behaviors may include:

- 1. Serious grade problems or a change from consistently passing grades to unaccountable poor performance.
- Excessive absences, especially if the student has previously demonstrated consistent attendance.
- Unusual or significantly changed patterns of interaction, i.e., avoidance of participation, excessive anxiety when called upon, domination of discussions, etc.
- 4. Other characteristics that suggest the student is having trouble managing stress successfully, e.g., a depressed, lethargic mood; very rapid speech; swollen, red eyes; marked change in personal dress and hygiene; falling asleep during class
- Repeated requests for special consideration, such as deadline extensions, especially if the student appears uncomfortable or highly emotional while disclosing the circumstances prompting the request.
- New or repeated behavior which pushes the limits of decorum and which interferes with effective management of the immediate environment.
- Unusual or exaggerated emotional responses which are obviously inappropriate to the situation.

Q. How do I make a referral?

While many students go to counseling or to the Office of Student Services on their own, your exposure to students increases the likelihood you will identify signs and/or behaviors of distress in a student. What can you do?

- Recommend campus services to the student or complete a Referral Form for Student Services Intervention and forward the form to a member of the Behavioral Intervention Team.
- Determine the student's willingness to go to a helping resource. Reassure the student that it is an act of strength to ask for help.
- Dispute the myth that only "weak" or "crazy" people go for counseling or use others' help.
- Remind the student that counseling resources are affordable (often free or reduced for students) and are confidential.
- Offer to help make the initial contact with the helping resource

Q. What are warning signs of disruptive student behavior that requires immediate attention?

Severely troubled or disruptive students exhibit behaviors that signify an obvious crisis and necessitate emergency care. These problems are the easiest to identify. Examples include:

- 1. Highly disruptive behavior (e.g. hostility, aggression, violence, etc.).
- Inability to communicate clearly (garbled, slurred speech; unconnected, disjointed, or rambling thoughts).
- Loss of contact with reality (seeing or hearing things which others cannot see or hear, beliefs, or actions greatly at odds with reality or probability).
- Stalking behaviors.
- Inappropriate communications (including threatening letters, e-mail, messages, harassment).
- 6. Overtly suicidal thoughts (including referring to suicide as a current option in a written assignment).
- 7. Threats to harm others.
- 8. Appearance of being under the influence of drugs or alcohol.
- Possession of a weapon.

Q. What are the warning signs of alcohol and substance abuse that might lead you to refer a student?

Physical warning signs of drug abuse

- Bloodshot eyes or pupils that are larger or smaller than usual
- Changes in appetite or sleep patterns. Sudden weight loss or weight gain
- Deterioration of physical appearance and personal grooming habits
- Unusual smells on breath, body or clothing
- Tremors, slurred speech, or impaired coordination
- Has burned fingers, burns on lips, or needle track marks on arms
- Exhibits impaired coordination or unsteady gait (e.g. staggering, off balance)
- Speaks more rapidly or slowly than normal

Behavioral signs of drug abuse

- Drop in attendance and performance at work or school
- Unexplained need for money or financial problems. May borrow or steal to get it
- Engaging in secretive or suspicious behaviors
- Sudden changes in friends, favorite hangouts, and hobbies
- Frequently getting into trouble (fights, accidents, illegal activities)
- Has difficulty concentrating, focusing, or attending to a task
- Frequently appears distracted or disoriented
- Makes inappropriate or unreasonable choice
- Experiences short-term memory loss
- Often needs directions repeated
- Has difficulty recalling known details

Psychological warning signs of drug abuse:

- Unexplained change in personality or attitude
- Sudden mood swings, irritability, or angry outbursts
- Periods of unusual hyperactivity, agitation, or giddiness
- Lack of motivation; appears lethargic or 'spaced out'
- Appears fearful, anxious, or paranoid, with no reason
- Experiences wide mood swings (highs and lows)
- Experiences general change in mood toward a more depressed and negative or critical outlook
- Appears fearful or anxious; experiences panic attacks
- Appears impatient, agitated, or irritable
- Experiences ongoing depression
- Has paranoid thoughts

FACULTY AND STAFF ACTION GUIDE

CONCERN FOR STUDENT

Incidents observed that provoke concern but require no emergency response



Behavioral Intervention Team

DANGER TO OTHERS

A student expresses (verbally or in writing) a willingness or desire to harm or kill others or a student demonstrates (in progress) or is attempting to harm or kill others.



CUPD and/or Threat Assessment Team

EMOTIONAL BEHAVIOR

If you see, or are dealing with, a student who "needs to talk to someone" about a personal concern or is experiencing a psychological crisis.



Behavioral Intervention Team

AGGRESSION

If you see, or are dealing with, aggressive or threatening behavior.



CUPD Dial 911 or 864-656-2222

ILLNESS OR INJURY

If you see or are dealing with a person who is injured, or ill, or whose behavior seems erratic.



CUPD or CUFD Dial 911 or 864-656-2222

DANGER TO SELF

A student expresses (verbally or in writing) a willingness or desire to harm or kill himself/herself with no specific plan

*In this situation, the danger is not imminent and only involves the person. *Example: A student may write about or discuss a sense of desperation or hopelessness with death as a solution.



Care Report CAPS CUPD

DANGER TO SELF

A student demonstrates (in progress) an attempt to harm or kill himself/herself or has a specific plan to harm himself/herself.

*Here the danger is imminent or in progress.

*Example: A student advises that he/she has taken pills, has a weapon, has cut self or that when he/she leaves, he/she is going to implement his/her suicide plan.



CUPD Dial 911 or 864-656-2222

SUBSTANCE ABUSE

A student appears to be under the influence of alcohol or drugs in class, or is seen in possession of same.



CUPD Dial 911 or 864-656-2222

SEXUAL ASSAULT

A student reports he/she is a victim of ongoing or very recent physical or sexual abuse at the hands of a relative, guardian, caretaker, spouse, boyfriend, girlfriend, or unknown.



Title IX Coordinator, Alesisa Smith 864-656-3181 or 911 as appropriate

DISABILITY

If you see or are dealing with a person with a disability who is in difficulty, ask if you may contact:



Student Disability Services, Priscilla Harrison

General Guidelines

- Remain calm and know whom to call. See referral numbers below.
- Remember that it is NOT your responsibility to provide professional help needed for a severely troubled/disruptive student. You need only make the necessary call and request assistance.
- When students express a direct threat to themselves or others, or acts in a bizarre, highly irrational or disruptive way, immediately call CUPD at 911 or 864-656-2222

Disruptive Student Behavior

The Student Handbook outlines the standards and expectations of students' conduct and behavior. Examples of disruptive behavior are as follows:

Conduct Disruptive to the University Community

Conduct that is disruptive to the university's educational objectives, to its operations, or to its officials, staff, and faculty in the performance of their work, or to any other aspect of its mission Such conduct includes, but is not limited to:

- Disruption of a class, university activity, or any other normal activity held on university property at a university location.
- Classroom behavior that interferes with either (a) the instructor's ability to conduct the class or (b) the ability of other students to benefit from the instructional program.
- 3. Actions causing physical injury or endangering one's own health or safety.

Causing Physical or Other Harm to Any Person

- Conduct causing physical injury or endangering another's health or safety, which includes, but is not limited to, acts of physical violence, assault, and relationship or domestic violence.
- 2. Actions causing physical injury or endangering one's own health or safety.

Sexual Assault and Sexual Misconduct

- Sexual Assault. Any sexual act or attempt to engage in any sexual act with another person without the consent of the other person or, in circumstances in which the person is unable, due to age, disability, or chemical or other impairment, to give consent.
- Sexual Misconduct. Any intentional intimate touching of another without the consent of the other person or, in circumstances in which the person is unable, due to age, disability, or chemical or other impairment, to give consent.

Harassment

- Harassment or Threats—Verbal or written abuse, threats, harassment, coercion
 or any other conduct that places another individual in reasonable fear for his or
 her safety through words or actions directed at that person, or substantially
 interferes with the working, educational, or living environment of the individual,
 including stalking and racial harassment.
- Sexual Harassment—Unwelcome sexual advances, requests for favors, and/or other verbal or physical conduct of a sexual nature when:
 - Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or status in a university activity or;
 - Submission to, or rejection of, such conduct by an individual is used as the basis for employment or decisions affecting such individual's employment or status in a university activity, or;
 - c. Such conduct has the purpose or effect of interfering with an individual's work or academic performance or creating an intimidating, hostile, or offensive employment or academic environment.

Q. How should I respond when a student is disrupting my class?

Faculty members have broad authority to manage their classrooms and establish reasonable guidelines for class discussions that ensure everyone has an opportunity to participate in an orderly manner. If you believe a student's behavior is inappropriate, consider a general word of caution rather than singling a student out or embarrassing the student. If the behavior in question is irritating, but not disruptive, try speaking with the student after class. Most students are unaware of distracting habits or mannerisms and have no intent to be offensive or disruptive. There may be rare circumstances where it is necessary to speak to a student during class about this behavior. Correct the student in a manner indicating that further discussion can occur after class. Examples of disruptive behavior include interrupting or monopolizing classroom discussion, interrupting instruction, and using inappropriate language.

If a student's behavior reaches the point that it interferes with your ability to conduct the class or the ability of other students to benefit from the class, the student should be asked to leave the room for the remainder of the class period. The student should be provided with a reason for this action and an opportunity to discuss the matter with you as soon as is practical. In such situations, consultation and referral to NRCC Security, the Behavioral Intervention Team, or the Threat Assessment Team may be appropriate. Faculty members should exercise sound judgment regarding the immediacy of the need and act accordingly.

IMPORTANT NUMBERS

CUPD:

Dial 911 or 656-2222

CAPS: 656-2233

Student Accessibility Services: 656-6848

Title IX: 656-3181

Advocacy & Success: 656-0935