


ADMINISTRATIVE PROCEDURE MANUAL			
	SECTION TITLE	NUMBER	PAGE
	BEHAVIORAL INTERVENTION	06-0913	1 of 5
	BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE REVISED	
	6Hx7-6.2 Safety and Traffic Control	March 13, 2024	

Background

This procedure establishes the protocol for dealing with issues that may potentially develop into acts of violence on a Florida State College of Jacksonville (FSCJ) campus/center. The Behavioral Intervention Team (BIT) focuses on preventing future student behaviors that threaten violence or physical harm to oneself or others on a campus, College property or at College events. The response to an imminent threat or present danger is covered by the current Comprehensive Emergency Management Plan (CEMP). This APM is designed to describe a standard procedure for slower developing issues that need to be monitored, engaged or addressed. Example 1: a student describes violence in a paper which the faculty member presents to the Dean. Example 2: an employee's comments or behaviors are making other employees feel uncomfortable and concerned about a potential incident of workplace violence.

Purpose


The purpose of this procedure is to establish a College behavioral intervention and threat assessment process and to describe the steps necessary in behavioral assessment and threat management. BITs are designed to identify early indicators of escalating and concerning behaviors, they are often able to identify and intervene before threats are formalized. The mission of the BIT process is to prevent targeted violence by students or employees. BITs engage in three (3) main functions: 1) gathering data from an individual and/or community; 2) analyzing this data using objective rubrics, tools, and assessments; and 3) intervening and following up based on the level of risk determined as a result of the assessment process.

Procedure

A. Administration

1. The BIT will consist of the following:
 - a. Chief of Police, Director of Public Safety;
 - b. Chief Officer, Organizational Culture and Engagement;
 - c. General Counsel or assigned College attorney;
 - d. Vice President of Student Development
 - e. Associate Vice President of Student Support and Engagement
 - i. Associate Director of Student Conduct
 - f. Faculty Members or Dean, as appropriate
 - g. Campus Security Officer/police officer, as appropriate
 - h. Other administrators or staff, as appropriate (employee cases)

2. The Chief of Police, Director of Public Safety and the Associate Vice President of Student Support and Engagement will chair the BIT Team. The Chair will schedule meetings, document actions and maintain records as necessary.

ADMINISTRATIVE PROCEDURE MANUAL			
	SECTION TITLE	NUMBER	PAGE
		BEHAVIORAL INTERVENTION	06-0913
BASED ON BOARD OF TRUSTEES' RULE AND TITLE		DATE REVISED	
	6Hx7-6.2 Safety and Traffic Control	March 13, 2024	


3. A subcommittee of the BIT shall screen applicants for admission who are designated sexual offenders in accordance with APM 10-0701. The Chair shall assign members of BIT to this screening subcommittee, which shall at a minimum include the Chair, Vice President of Student Development, Associate Vice President of Student Support and Engagement, Associate Director of Student Conduct, Chief Officer, Organizational Culture and Engagement and the General Counsel or College attorney.

B. Behavioral Intervention Team (BIT)

1. The BIT may be convened by the Chair to review student and employee cases.
2. As needed, one or more of the following may be included as a resource for a case review:
 - a. a Jacksonville Sheriff Office (JSO) officer or FSCJ police officer appropriate to the specific situation;
 - b. a representative of the College's Student Assistance Program (SAP) or Employee Assistance Program (EAP) contractor;
 - c. and others with relevant knowledge of the case as determined by the Chair.

C. Responsibilities

1. The Chair has the responsibility and authority to convene a case review and will keep the College President informed regarding cases. The Vice President of Student Development will notify additional leadership, as deemed appropriate.
2. For student cases, the Associate Vice President of Student Support and Engagement, or designee, shall maintain case records and coordinate the transition of cases between the College's Student Disciplinary and BIT processes. The Chair's administrative assistant may attend case meetings for the purpose of recording minutes.
3. For employee cases, the Chief Human Resources Officer (CHRO), or designee shall maintain the records and facilitate the transition of cases between the employee discipline and the BIT processes. The CHRO's administrative assistant may attend case meetings for the purpose of recording minutes.
4. The Associate Vice President of Student Support and Engagement may be called upon to assess the applicability of disability laws in a specific instance and to help the team avoid discriminating against individuals based on a disability or a perceived disability.
5. The FSCJ Police Lieutenant and FSCJ police officer from the campus will conduct initial investigations, interview witnesses and others, conduct incident report searches for related instances, maintain security records and provide security as requested during team member

	ADMINISTRATIVE PROCEDURE MANUAL		
	SECTION TITLE	NUMBER	PAGE
	BEHAVIORAL INTERVENTION	06-0913	3 of 5
	BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE REVISED	
	6Hx7-6.2 Safety and Traffic Control	March 13, 2024	

interviews with the student or employee of interest. The Associate Director of Student Conduct may be part of the initial investigation. For employee cases, the Employee Relations and Equity Coordinator in conjunction with the College Security Investigator will conduct the initial investigation.

6. The General Counsel or College attorney will advise the team on applicable legal considerations and the options the team is considering.
 7. The investigating FSCJ police officer may be requested by the Chief of Police, Director of Public Safety, or designee, to conduct off-campus information gathering in support of case inquiries.
 8. A representative of the Student Assistance Program or Employee Assistance Program vendor may be included, as appropriate, to provide general mental health information and guidance.
- D. Member Training - The members of the BIT Team will engage in regular, ongoing training on issues related to BIT functions, risk assessment, team processes and pertinent knowledge related to BIT and threat assessments.
- E. Relation to Student and Employee Discipline Procedures - The BIT processes augment the College's [Student Disciplinary Procedures](#) and applicable employee disciplinary procedures. Implementation of the BIT process should not affect applicable disciplinary procedures.
- F. BIT Inquiry - The BIT Team will use an objective risk assessment rubric to assist in evaluating the information gathered. The BIT is authorized:
1. to gather all available information allowed by law,
 2. to assign appropriate security, police or other appropriate College personnel to conduct additional investigations,
 3. to interview the individual of concern or others with one or more team members,
 4. to enlist the services of the College's Student Assistance Program (SAP) or Employee Assistance Program (EAP) vendor as appropriate,
 5. to utilize the services of the police officer at the Campus
 6. to conduct background checks as approved by the General Counsel representative.
- G. Threat Investigation
1. In the event the BIT determines there is the potential for targeted violence, the case shall be reported to FSCJ Police. The FSCJ Police should be involved in cases as soon as possible whenever a threat of imminent violence is determined.

ADMINISTRATIVE PROCEDURE MANUAL		
SECTION TITLE	NUMBER	PAGE
BEHAVIORAL INTERVENTION	06-0913	4 of 5
BASED ON BOARD OF TRUSTEES' RULE AND TITLE		DATE REVISED
6Hx7-6.2 Safety and Traffic Control		March 13, 2024

H. Response Plan

1. The BIT may choose to develop and implement individual response plans for students. The CHRO, or designee, may choose to develop and implement individual response plans for employees. The team will monitor a case until such time as it is determined there is no longer the potential for targeted violence on a Campus. The plan will:
 - a. Control/contain the situation and/or individual in a way that will minimize the risk of violence;
 - b. Protect and aid possible targets; and
 - c. Provide reasonable support and guidance to help the individual deal successfully with contributing problems.

I. Administrative Actions

1. Administrative actions concerning students will be made in accordance with the current student disciplinary procedures and in collaboration with the Office of General Counsel and the Vice President of Student Development. Actions may include but not be limited to:
 - a. Administrative withdrawal;
 - b. Conditional readmission;
 - c. Dismissal.
2. Employment actions will be made using established College procedures. The CHRO may direct an employee to remain off campus or otherwise restrict their access to College facilities and programs while a situation is under review.

J. Records and Reporting

1. A final report of the findings of the BIT, including all documentation, shall be completed and filed by the Associate Vice President of Student Support and Engagement, or designee, for student cases and by the CHRO, or designee, for employee cases. For students and employees, an informational incident report shall be completed by Campus Security on the campus the student or employee is located and for which the BIT convened. The report shall contain the name of the student or employee along with sufficient details of the event that resulted in the BIT process in order to have a record for future use if applicable. Student case records and meeting minutes mentioned in this APM shall be maintained by the Associate Vice President of Student Support and Engagement, or designee. Employee case records and minutes shall be maintained by the CHRO. The Chief of Police, Director of Public Safety shall also maintain copies of each BIT proceeding.



ADMINISTRATIVE PROCEDURE MANUAL

SECTION TITLE	NUMBER	PAGE
BEHAVIORAL INTERVENTION	06-0913	5 of 5
BASED ON BOARD OF TRUSTEES' RULE AND TITLE		DATE REVISED
6Hx7-6.2 Safety and Traffic Control		March 13, 2024

REFERENCES: F.S. 1001.64, 1001.65

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