

## **Empowering Comprehensive Campus Cultures of Reporting**

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***The single most powerful way we can intervene prior the emergence of campus violence is to intentionally, actively and strategically empower a culture of reporting within the campus community and the larger related community.***

In this article, we offer a comprehensive discussion of how to create, empower, expand and maintain cultures of reporting on college campuses as vital violence prevention mechanisms. It's a revisiting of a topic you have heard us discuss previously, but treated here with a greater depth of exploration. Since the shootings at Virginia Tech, more than 1,600 college campuses have created or revised their behavioral intervention and threat assessment team capacities. Yet, no matter how well-crafted and operational these teams may be, they are only as powerful as the intel they receive from members of the community. You can't act on what you don't know. We talked in a recent article about the need to get the information from those who have it to those who need it: our campus behavioral intervention and threat assessment teams. We highlighted the need to empower cultures of reporting in NCHERM's Post-Huntsville webinar, and in this article we fully develop the practical steps needed to empower reporting cultures.

***Comprehensive cultures of reporting don't exist without our efforts. They must be built.***

What Is a "Culture" of Reporting?

A willingness to report concerning behaviors exists on all college campuses, with some members of the community, in certain situations, and to certain individuals. That willingness exists because of the attention-getting nature of the situation, the proactive nature of the reporter, or the trust relationship between the reporter and the resource with whom they share their intel. That isn't a reporting culture. It's a reporting cell, and it exists on a micro level and only when the right circumstances are present. A reporting culture exists on a macro level, transcending severity, proactivity and trust relationships. It gets the right information to the right people in real time most of the time. At its best, the reporting occurs early enough that it allows a team to get out ahead of violence.

In a culture of reporting, we report what we know because that's what we do, and it is emblematic of who we are. We have internalized the notion of community and our interconnectedness within it. We are certain in our role as stakeholders who have responsibility for the safety of our community.

Do the members of our campus communities feel that way? No, not most of them. How do we move them from NIMBY to IYSSSS? How do we shift consciousness from "Not in my backyard" indifference to "If you see something, say something" engagement? What follows is our best thinking on how to reshape your cultures for this purpose.

Practical Approaches to Get You There

- Teach Your Community a Common Language for What to Report, to Whom, When, and How

Are we looking for disruptive behaviors? Concerning behaviors? What is “concerning?” What are signs of suicidality? How do we know if someone really means it when they make an offhand suicidal reference? Should we be concerned about student writing? In class? Online? What is a red flag? You need to be able to answer all of these questions, and teach the members of your community the answers. Use the available venues. Teach students at orientation, hall programs, and in College 101 classes. Teach parents via mailings and at orientation. Use the resources of your parent outreach office. Train faculty at new faculty orientation, at classroom management sessions, with brochures, and other professional development opportunities. Train employees at new employee orientation, through regular training opportunities, through briefings to supervisors, and don’t forget to include custodial staff, facilities, and administrative support staff. They see all, often more than you do. Train those you cannot train live, especially adjuncts, using online resources such as *Kognito* or *Campus Safety 101* from MAGNA Publications. Tie training and reporting to Clery Act compliance and the need to report for statistical and timely warning purposes. Teaching gatekeeper methods is a well-regarded means of establishing a common language for recognizing and responding to mental health-related concerns. Common programs include QPR from Eastern Washington University<sup>1</sup>, Campus Connect at Syracuse University<sup>2</sup> and the U.S. Air Force Suicide Prevention Program<sup>3</sup>.

#### Create and Maintain Feedback Loops

If an employee or community member reports a concern to your team, and it disappears into a vacuum of privacy, confidentiality or dysfunction, you have harmed the reporting culture you are trying to build. Reporters need to be reassured to you are taking prompt, appropriate and competent action. Faced with a vacuum, it will be too easy for a reporter to assume concern was lost, disregarded, or devalued. A simple (even automated) message, “Thank you for bringing this information to the attention of the Behavioral Intervention Team. Your report will be assessed and evaluated within 24 hours, and a team member will contact you to follow-up” can be very reassuring. And then, follow-up. FERPA allows you to create a feedback loop with officials of your institution and subcontractors whom you deem to have a legitimate educational interest, by sharing some BIT-related aspects of a student’s education record. Or, you may be able to obtain a student’s consent. Diagnosis, treatment, and intervention details are often inappropriate to share, but FERPA will allow you to say (as an example), “Johnny is experiencing a significant (mental health/family/relationship/coping/stress/unspecified) crisis. The team is fully informed, as is his family. Appropriate interventions have been deployed, but if you continue to see (disruptive/concerning/suicidal/abusive/insubordinate/harassing) behaviors, we ask you to share that with the team at once. We could not have acted as promptly without your

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<sup>1</sup> <http://www.qprinstitute.com/>

<sup>2</sup> <http://counselingcenter.syr.edu/index.php/campus-connect/>

<sup>3</sup> <http://afspp.afms.mil>

report. Thank you for taking ownership in the safety of this community.” Depending on state employee record privacy laws, you may be able to share more or less about employees than you can about students.

Violence Prevention Experts Already Exist on Your Campus. Draw on Their Expertise

More and more, we are coming to recognize the commonality of the prevention of targeted violence to the prevention of other violence common to college communities, such as hazing and sexual assault, and to prevention generally with respect to alcohol, drugs, tobacco, eating disorders, etc. Constructs of primary prevention, secondary prevention and tertiary prevention are cognates to the threat assessment phases of pre-threat prevention, threat-parallel intervention and post-threat response (post-vention). The intersection is made even more explicit by the research of David Lisak, Christine Gidycz, Antonia Abbey and Stephanie McWhorter, who are giving us tremendous insight into patterns of violence that very accurately characterize a serial rapist, and just as readily describe the violent patterns of Seung-Hui Cho, Stephen Kazmierczak, and Dr. Amy Bishop. As much as we need to be availing ourselves of access to researchers like those mentioned above, we also need to look to our own professors of psychology, criminology, or criminal justice, or violence prevention specialists who work in campus crisis centers, health/wellness and prevention programs. What they know is directly relevant to what behavioral intervention and threat assessment teams do, when you view prevention holistically.

Empower Anonymous Reporting

Many members of our communities want to share with us what they know. But, not if it means becoming personally involved. Anonymous reporting capacities will empower those individuals to share what they know while preserving their privacy and potentially shielding themselves from personal involvement. When we first advocated for exploration of anonymous reporting capacities on college campuses, for the reporting of sexual assault, for silent witness programs within campus law enforcement, and for behavioral intervention teams, our clients raised their concerns for abuse of such capacities. We responded that even if such systems were abused, receiving false reports and attempts to assassinate character, anonymous reporting still had value. We would need policies to address the abuse, but the potential for abuse was not reason enough to give up on anonymous reporting. And then a funny thing happened on the way to the online anonymous forum...the abuse never occurred. Oh, there is an occasional libelous submission, but the level of abuse is so low that value of such systems clearly outweighs any downside. The fear of abuse is simply a phantom fear. Why? Apparently, it is too much work to go the trouble of false reporting. Some campuses and school districts are even piloting anonymous free text tip lines with great success. One of the downsides of anonymous reporting is that we lose the ability to deputize the reporter as an agent of an effective intervention, but technology has even addressed that. Many of the online reporting systems now available allow

team members to continue a dialogue with anonymous reporters without compromising their anonymity. Safer living through science!

Make Amnesty an Accepted Norm and Mean It

We'll admit to some frustration on this topic, up front. Formalized Amnesty, Immunity and/or Good Samaritan policies ought to be in place on every college campus, and that should have happened ten years ago. That amnesty has been so slow in adoption and implementation on most campuses is frankly a failure of leadership in the student conduct field. More and more campuses are coming along, but the pace has been glacial. Amnesty is debated in ways that are defeatist, and we're hoping to change the nature of that debate. Some form of Amnesty is good for your community. Accept that. It's true. Amnesty and Immunity foster a culture of reporting. It is appropriate to send a message to your community that there are some infractions so harmful to health and safety that reporting them and institutionally addressing them is more important than incidental infractions by the reporter themselves. But, then the debate shifts to abuse of the Amnesty, and paralysis sets in. Shift the debate. Accept the need for it, and then we can debate effective remedies for abuse. For example, most campuses that offer Amnesty or Immunity do so only for minor violations of alcohol and drug policies, or other lower-level infractions. Drug use is eligible, drug dealing is not. The health hazard of dealing is too great to ignore. Other campuses debate whether individuals or groups can receive Amnesty. Groups can, but immunity may be limited to group or individual sanctions, depending on the circumstances. Some campuses adopt partial or limited Immunity rather than full Amnesty, reserving the right to impose educational consequences, but waiving conduct sanctions. Fine. Other campuses limit the number of times you can invoke Amnesty. Also fine. Amnesty ought to extend to those who need assistance and those who render it, but some campuses draw the line at immunizing someone who created a danger (as in serving someone alcohol who is under age and then later calling an ambulance for that person when they drink too much). We can see that logic, and suggest that the aid may be a mitigation of the sanction, but can still see the need for a sanction in such a case. Still, some level of Amnesty is in play. If you want those with intel to share it with you, you need to be willing to dismantle some of the major impediments to reporting. Now, once you have conduct Amnesty in place, explicitly apply it to reporting to your behavioral intervention and threat assessment teams.

Empower Bystander Intervention

Again, we encourage you to take a page from the research-based, demonstrated effective prevention efforts on college campuses around the country, and those experts on our own campuses who are already implementing programs like the Green Dot<sup>4</sup>, Bringing in the Bystander™<sup>5</sup> and "No Zebras, No Excuses"<sup>6</sup>. These programs have been used for years to

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<sup>4</sup> Pioneered by Dorothy Edwards at the University of Kentucky <http://www.uky.edu/StudentAffairs/VIPCenter/>

<sup>5</sup> Implemented successfully at the University of New Hampshire by Victoria Banyard  
<http://www.unh.edu/preventioninnovations/index.cfm?ID=BCC7DE31-CE05-901F-0EC95DF7AB5B31F1>

promote bystander empowerment as a tool of sexual violence primary prevention. Do we accept that many members of our community choose to be bystanders rather than intervene in emerging violence, mental health and concerning behaviors, just as they might with sexual violence? If so, how might we adapt these models to broader violence prevention in addition to sexual violence? These programs are built on methods that overcome barriers to intervention including recognition of risk factors, debunking common bystander assumptions, imparting safe engagement tools and techniques, and modeling successful interventions. Those steps will work with alcohol, sexual harassment, hazing, eating disorders, and targeted violence, too. Asking our community members to report is not enough; we have to teach them to be interveners first.

Destigmatize Mental Health Issues

On most of our campuses, students have paved the way for us. It is their culture to be open about mental health needs, and to be very open about their use of counseling, medication, and accommodation. Our messages should honor their openness, and encourage their awareness, access and use of our campus resources and those in the larger community. The aforementioned Gatekeeper approaches can achieve much in reducing fear of mental illness, increasing awareness, aiding identification, and knowing how to respond to awkward, bizarre, threatening or dangerous situations. Resources from the Jed Foundation<sup>7</sup> (especially its ULifeline™) and the Bazelon Center<sup>8</sup> are indispensable on many campuses. At the same time that we work to destigmatize mental health issues, we need to work in tandem to destigmatize disability issues, as they often present hand-in-hand. We hear of faculty and staff who are afraid to refer a student to disability service fearing some legal reprisal for forcing a student to disclose a disability. Forcing someone to disclose a disability as a condition of admission, for example, would be problematic, but that is far different from informing someone of the resources available to them, and encouraging them to make use of them. That is what the ADA is designed to foster, in fact. The critical balance is to raise awareness without stigma, and that tightrope walk is made more challenging by the fact that factors exacerbating mental health instability -- such as erratic medication use, alcohol use, and high stress -- are more common in college environments, and each successive campus shooting more intimately associates mental illness and violence in the public mindset.

Sell the Message That Your Team's Purpose Is Caring and Preventive

One of the key ideas here is to be in charge of framing your message. What is the purpose of your team? What is it designed to do? Will your community define your team for you, or will you define it for your community? If the sense is that the team is intended as a Big Brother, tracking people and incidents so that we can kick students out, we will inhibit the culture of

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<sup>6</sup> Central Michigan University model developed by Steve Thompson

[http://www.cmich.edu/SAPA/Programs/No\\_Zebras.htm](http://www.cmich.edu/SAPA/Programs/No_Zebras.htm)

<sup>7</sup> <http://www.jedfoundation.org/professionals/programs-and-research>

<sup>8</sup> <http://www.bazelon.org/>

reporting, stigmatize mental health, and characterize the team's function as punitive. Our message from the outset needs to counter any tendency toward that perception, and the best way to do that is with a simple, consistent message about the team. Our purpose is to be caring and preventive. Buy-in is easy on that concept. Stakeholders will take stakes in those outcomes. It's non-threatening, positive, and possible. Your marketing task is to convince the members of your community of the benevolence of your purpose. If you do, they will invest in your team and its worthy goals.

Consider a Campus Reporting Mandate

We debate this idea here at NCHERM. We see one argument that a policy requiring reporting of all concerning incidents by all (non-privileged) employees forces people to do something, rather than motivating them to report voluntarily and cooperatively. For that reason, an imposed mandate may be met by resistance and some level of non-compliance or reticence. It's more powerful and effective to encourage reporting through buy-in. We also see another argument, which is that asking our employees to report what they know is reasonable, and if it is part of their job, we should say so, and make our expectations clear to them. Many employees already are required to report crimes, and asking them to report concerning behaviors too is not significantly more burdensome. Legally, what our employees know will often be imputed to the institution, and if we're going to be held legally accountable for knowing what they know, we might as well impose a duty on them that will allow us to satisfy an institutional duty of care. Perhaps creating a policy-based expectation rather than a mandate is a workable middle ground that allows clarity without the heavy hand of imposition?

Teach Parents About Your Team

"Hi, this is Johnny's mom calling. You Chair the BIT, right? Well, I wanted you to know that I'm worried about Johnny. He seems different. More distant. His friends have noticed, too. He may be depressed. Do you know if something happened to him at school? He won't tell us anything. Don't tell him I called you, but I was hoping you could keep an eye on him?" Deans of Students know these calls well. They are another good source of intel. Not only do teams need to be adept at knowing when to reach out to parents, but we can also teach parents that they can reach out to the team as a resource. If you have an orientation for parents, have an office for Parent Liaison or can get information to parents during drop-off, or otherwise communicate electronically, by brochure, or through students, we recommend that you convey the following:

- We have a behavioral intervention team. It is caring and preventive.
- It is designed as an early identification system for at-risk students.
- It is the only resource collecting information holistically about student mental health, disability and coping challenges.
- If you're concerned about your son or daughter, their roommate, or one of their friends, you should feel welcome to share your concerns with the team.
- The team accepts anonymous reports.

- Here the website for our team. It will introduce you to our members, our operating protocol, and how to contact us...
- In an emergency, do not contact them team. Call ###-###-####.

Ensure the Community-at-Large Can Report to Your Team

In addition to opening the doors to the intel possessed by parents, a culture of reporting can be empowered by accepting reports from outside the campus community. We recommend that you establish MOUs with local agencies, organizations and resources who may be aware of critical information. They need to know that you have a team, that their reports are welcome, and that your team may be the only resource community-wide that is centralizing information about an individual who is rapidly unraveling. Family members, roommates, employers and other local and extended community members may know more about the status of someone who is on your team’s radar screen than your team does, and opening the flow of information from them (e.g., Amy Bishop’s husband) could provide critical pieces of the puzzle that your team needs to act appropriately and swiftly.

Train on FERPA, HIPAA and Confidentiality to Break Down Silos and Artificial Impediments to Information Flow

Too often on campuses, we hear “I can’t tell you that...FERPA.” What we need to be hearing is, “If I don’t tell you that, people might get hurt, or killed.” FERPA is the lesser concern in that context. FERPA was never meant to impede the flow of internal institutional communication, and certainly not crisis communication. Our Registrars have wrapped themselves in FERPA armor, and expect everyone else to coat education records with Teflon, but we’re over-protecting. FERPA has become an excuse to silo information, and forgive the Reagan-esque reference, but Mr. Registrar, tear down those walls. We need to shift our consciousness from worrying about violating a well-meaning, important, but painlessly-enforced statute to creating a free flow of necessary information. Student privacy is important. So is student safety. We have talked about the need to rebalance institutional priorities in an era of increasing violence, and this is one of those areas. To registrars, FERPA should be sacrosanct. To others, especially BIT team members, FERPA does not and should not impede critical communication flow. Over the last decade, the Foundation for Individual Rights in Education (FIRE)<sup>9</sup> has made a mark by elevating the importance of individual rights in higher education. With 33 deaths, Seung-Hui Cho has forced our focus from individual rights to community well-being and safety. We’re not suggesting that individual rights aren’t of concern, but right now, community safety has to have primacy. Will that compromise individual rights in some circumstances? Inevitably, and that’s okay. It’s not an excuse to move to wholesale compromising of individual rights, but the decade of FIRE is over. There’s been too much firing on college campuses. We’re not here to tell you what the right balance of individual rights and community safety is for your campus. We are

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<sup>9</sup> [www.thefire.org](http://www.thefire.org)

here to catalyze that debate within your community, because we all need to be discussing what we need to do to balance and safeguard two important priorities that can be directly at odds with each other.

HIPAA, the Health Insurance Portability and Accountability Act, doesn't cover the activities of most campus health and counseling services. If it does, it really doesn't protect the records of those services any more than the professional ethics and state confidentiality laws in place already do. None of those records would flow to a team whether HIPAA applied or not, unless there was an emergency, for which state laws and HIPAA have provisions. But, don't throw up a HIPAA wall if it doesn't apply to you<sup>10</sup>. If HIPAA does not cover your campus, your team may still need to protect certain documents it receives that are HIPAA-protected, such as hospital records or the results of outside mental health assessments. For most campuses, though, HIPAA provides no more of an impediment to information flow than would FERPA.

Counselor confidentiality should create some silos, intentionally, but we need to be precise about how much. We've written much on this topic already, but some simple reminders here may be useful. Administrators, don't ask counselors for information that you know state law or professional ethics forbid them from sharing, but do give them information that might make them aware of an imminence-threshold of severity and would allow them to make appropriate release of information to prevent the impending harm. Counselors, don't overprotect that which isn't protected. What you know from your client about your client is confidential, but what you may know about your client from a dean, a parent, the 'Net, a roommate or other non-client, non-confidential source is potentially shareable. Directing reporting of campus concerns to counselors may make sense because counselors are good resources, but can impede information flow and timely action because counselors may not report out what they get in. But, if the information isn't about a client, again it can be shared. Behavioral intervention teams and campus counselors are hard at work around the country negotiating and navigating how information can and should flow between them. That's a valuable and ongoing area of conversation well-worth your time and attention.

Establish an Anti-Retaliation Policy to Protect Those Who Report

Policies may not protect people, but failing to have them can expose people. While this kind of policy is unlikely to prevent retaliation, knowing there is recourse is important. Assuring members of your community that your team values protecting its sources may engender freer flow of information from those sources, while also giving critical tips on how to minimize the risk of retaliatory actions against a reporter.

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<sup>10</sup> HIPAA's applicability is discussed in our previous Whitepaper, available at: [http://www.nabita.org/docs/whitepaper\\_risk\\_mitigation.pdf](http://www.nabita.org/docs/whitepaper_risk_mitigation.pdf)