



Inter American University of Puerto Rico

President's Office

POLICIES FOR HANDLING CRISIS SITUATIONS CAUSED BY STUDENTS EXHIBITING SIGNS OF BEHAVIOR ATTRIBUTABLE TO PSYCHOLOGICAL DISABILITY

Normative Document E-0513-004

Introduction

As an integral part of its mission, the University aims to contribute to society through the formation of educated citizens, committed to democratic and Christian principles, without discrimination of any kind and in accordance with the applicable laws to achieve this, admits students who meet the academic requirements, but they may also have diagnostic psychological conditions that are not in line with the University's mission or undergoing treatment.

While supporting all its students in achieving their educational goals and providing reasonable accommodation and referral assistance for some psychological conditions, the University must also ensure the safety and well-being of the University community and maintain a safe and healthy learning and living environment.

This policy document focuses on the prevention and management of crisis situations involving students who may engage in attribution behaviors to psychological disability that may affect the safety of the university community. In addition, it complements what is established in the General Student Regulations.

I. Legal base

This normative document is promulgated by virtue of the authority conferred to the President by the Board of Trustees in the Statutes of the University and the federal and Puerto Rico laws concerned; among others, the "Americans with Disabilities Act" (known as the ADA), Section 504 of the Equal Employment Opportunity Act for Persons with Disabilities of 1985, the "Higher Education Opportunity Act", as amended, and FERPA.

II. Purpose

In addition, it is enacted for the purpose of addressing crisis situations involving students who exhibit behaviors consistent with condemnation of student behavior attributable to psychological disability, by means of a mechanism for the articulation of information in each academic unit, Intervention and Preventive Action Committee (CAPI).

III. Scope

This normative document will apply to all academic units of the university system.

IV. Definitions

For purposes of this document and in harmony with current regulations, the following terms or expressions shall have the meanings described below:

- 4.1 Reasonable Accommodation – Any modification or adjustment to a program of study or physical environment that allows the student to demonstrate academic achievement, participate in programs and benefits, and enjoy academic life on an equal basis with other students. Reasonable accommodation may be requested by any student with a disability who meets the requirements established by law.
- 4.2 Preventive Care and Intervention Committee (CAPI) - A group or team of persons, appointed by the chief executive, who actively participate in the design, implementation and evaluation of strategies, actions and procedures aimed at addressing situations related to students with psychological disabilities in the academic units. The Dean of Student Affairs will be the coordinator of the Committee and will meet as often as necessary to address situations that arise in the unit.
- 4.3 University community - Members of the Board of Trustees, students, teaching and non-teaching employees, visitors, etc.
- 4.4 Crisis or emergency - A situation requiring immediate attention.
- 4.5 Psychological disability - A particular condition of psychological functioning with which one may have been born or which may have occurred after birth. It is characterized by limitations of both psychological processes and social and practical adaptive skills.
- 4.6 Chief Executive Officer - the President of the University, the Chancellor of each Campus, the Dean of the School of Law, and the Dean of the School of Optometry.
- 4.7 Employee - Any person appointed or hired at the Inter American University of Puerto Rico for a definite or indefinite period, as teaching or non-teaching personnel, and for whose services he/she periodically receives, in exchange, compensation.
- 4.8 Student - Any person who is enrolled in a course or program of the university.

- 4.9 Student of Concern - A student who has exhibited erratic behaviors or who has provoked one or more incidents related to his/her psychological disability and who is receiving attention or mediation from the Preventive Action and Intervention Committee.
- 4.10 University Counseling Program - A unit or office in the academic units of the University that provides university counseling and career counseling services.
- 4.11 Types of incidents attributable to a student's psychological disability
- a) Mild Incident- Any incident in which a student demonstrates aggressive tendencies, extreme anxiety and preoccupation with trivial matters, symptoms of depression, or poor ability to exercise self-control may be considered a mild incident. Mild incidents do not require immediate intervention, but should be monitored closely, as they may be the preamble for larger scale incidents to occur. This type of incident, especially if it happens repeatedly, should be reported to the Preventive Action and Intervention Committee coordinator and the Dean of Student Affairs.
 - b) Moderate Incident - Moderate incidents are those in which the student violates existing codes of conduct but does not present an immediate risk to the physical integrity of any member of the community, nor the destruction of property or university facilities. Examples of moderate incidents include verbal harassment or verbal assaults directed at a particular person and minor damage to university property. Moderate incidents will be handled through the appropriate offices on each campus, such as the University Counseling Program and the University Guard. These offices will place emphasis on stopping the behavior and preventing it from escalating. Moderate incidents, especially those that occur repeatedly, should be reported by the community to the Dean of Student Affairs.
 - c) Serious incident - An emergency situation that requires immediate attention because it threatens the life and/or integrity of any member of the university community. Serious incidents will be handled through the Puerto Rico Police and/or emergency systems such as 9-1-1. Internally, they will be managed through the concerned university organizations, such as the University Orientation Program, the University Guard, and the CAPI, under the direction of the Dean of Student Affairs. Some examples of serious incidents are armed assault, attempted suicide and self-mutilation, among others.

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- 4.12 Management Plan - Plan prepared and adopted by each academic unit of the University, in harmony with its economic and financial resources and available personnel, to deal with crisis situations related to students with psychological disabilities. The Management Plan should contain three main areas: prevention, intervention, and post intervention.
- a. Prevention - Measures to be taken beforehand or in advance to avoid the occurrence of emergency situations related to students with psychological disabilities.
 - b. Intervention - Actions taken to immediately address crisis situations. Its purpose is to minimize the damage and risks that such incidents may present.
 - c. Post-intervention - Courses of action or measures following emergency situations to restore the normal order of interactions among members of the university community.

President - The president of the Inter American University of Puerto Rico.

Academic Unit - Each of the campuses, the School of Law, the School of optometry and any other unit to be established in the future.

4.15. University or Institution - The Inter American University of Puerto Rico.

V. Responsibilities

5.1 The Chief Executive of each academic unit will be responsible for:

5.1.1 Appoint the members of the Preventive Action and Intervention Committee (CAPI) of its Unit. This committee will have representation from various functional areas and service offices, such as: the Dean of Students, the University Counseling Program, Security, Dean of Administration, Dean of Academic Affairs, the Chaplaincy, and other resources of the unit that are determined to be useful to address emergency situations related to psychological disability. The Dean of Student Affairs will be the director or coordinator of the CAPI.

5.1.2 Support the CAPI in its functions of mitigating and addressing crisis situations with students with psychological disabilities.

5.2 The Dean of Student Affairs of each unit, or his/her counterpart, will be responsible for keeping updated the prevention, intervention and post intervention processes that are part of the Management Plan. Responsibilities include:

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- 5.2.1 Receive and articulate the information received through complaints from any member or entity of the university community.
 - 5.2.2 Design and implement a mechanism to facilitate that any member of the university community (faculty, students, and non-teaching employees) can report incidents, if necessary, anonymously. Some examples could be complaint mailbox, hotline, written report form, via email, etc.
 - 5.2.3 Activate the Preventive Care and Intervention Committee when necessary
 - 5.2.4 Implement the Protocol for reporting and intervening in case of incidents related to students with psychological disabilities (Annex A)
 - 5.2.5 Coordinate, with the support of CAPI, training and/or educational workshops to disseminate information on mental health, how to recognize its symptoms and support services available to the university community.
 - 5.2.6 Establish formal cooperation and assistance agreements with the Puerto Rico Police, Emergency Management, firefighters, hospitals, and others.
 - 5.2.7 Coordinate frequent drills to ensure the viability of the processes developed for the Preventive Action Plan.
- 5.3 The Preventive Action and Intervention Committee, coordinated by the Dean of Student Affairs, will be responsible for:
- 5.3.1 Prepare a Management Plan according to the resources available in your unit. The plan should contain three main areas: preventive action, intervention, and post intervention
 - 5.3.1.1 Preventive Action

The prevention plan will include access to information through training and workshops for the entire university community. Mechanisms will be established to identify and report students of interest in addition, drills will be conducted and contingency plans will be drawn up, as detailed in Annex B.
 - 5.3.1.2 Intervention

An Intervention Protocol will be designed to handle incidents of mild, moderate, or severe type. For its preparation, the guidelines suggested in Annex A: Protocol for reporting and intervening in case of incidents caused by students with psychological disabilities will be followed.

5.3.1.3 Post intervention

During the post-intervention phase, the student's future relationship with the University that triggered the emergency will be determined during the post-intervention phase. In deciding on the best action to take for the student in post-intervention, consideration should be given to whether the student had voluntarily sought counseling services or was receiving any treatment for his or her condition.

- 5.3.3 Evaluate each episode that is referred to you and do what you can to prevent it from escalating. Proper case management can prevent a mild episode from escalating into a moderate episode from escalating into a severe episode.
- 5.3.4 Determine what type of support or counseling can be provided, both to the student identified as a Student of Concern and to the other members of the community with whom the student interacts.
- 5.3.5 Articulate the information received from the different university organizations involved in serving students with psychological disabilities and the potential situations caused by them. In addition, the CAPI has the function of referring students to the office that can provide them with the corresponding service and of keeping a record of the actions taken to handle each case. Each office will take the necessary measures to maintain the confidentiality of the case.

VI. Separability

If any part or section of these guidelines and standards is declared invalid by a competent authority, such decision shall not affect the remaining parts.

VII. Repeal or amendment

These guidelines and policies supersede any documents or guidelines that conflict with the provisions herein. This document may be amended or repealed by the President of the University.

VIII. Approval

Ledo. Manuel J. F President

Date (D-M-Y) - z -

Protocol for Notifying and Intervening in Cases of Incidents Involving Students with Psychological Disabilities

The following guidelines will serve as a suggested model for the intervention phase of the Management Plan to be established by each academic unit, according to the resources available. Although, for the purposes of the Management Plan, a distinction is made between minor, moderate and serious incidents, it is worth mentioning that the three types of incidents are of equal importance and require the same attention and promptness in their management by the University.

I. In the case of minor incidents:

1. Any member of the university community who witnesses a minor incident should be receptive and allow the student to express him/herself within a framework of respect for the existing rules of the University.
2. Members of the university community, such as faculty, students, and non-instructional employees, may refer the student to the University Counseling Program, the Chaplaincy, or other university agencies that may be able to assist the student.
3. Faculty members should make a referral for the student to attend the University Orientation Program or the Chaplaincy.
 - 3.1 The University Counseling Program, Chaplaincy or the receiving agency will provide confidential counseling to the student. Even so, the person attending the student must report to the Dean of Student Affairs any threat made or desire expressed to commit any act that threatens his/her own safety or the safety of others.
4. The Dean of Student Affairs will be responsible for following up on the case, especially in the case of repetitive incidents. The student will be identified as a *student of concern*.

II. In the case of moderate incidents:

1. Any employee or student who witnesses a moderate incident caused by a student with a psychological disability shall have a duty to report the incident to the University Guard immediately. The University Guard will intervene to stop the reprehensible conduct.
2. Both the witnesses to the incident, as well as the University Guard, will be required to submit a written report to the Dean of Student Affairs or his/her counterpart. The report shall contain an account of the conduct allegedly incurred by the student and a description of the events that occurred as a result of it.

3. The Dean of Student Affairs will convene the CAPI, a confidential and objective investigation of the case will be carried out and an official report will be submitted to the Principal Executive of the Unit.
4. The Chief Executive of the Unit will evaluate it and, together with the CAPI, will make recommendations to deal with the situation.
5. The determined action will be taken, whether it is the recommendation of counseling, suspension, or expulsion of the student, change of the student's class, or any other corrective action.

III. In the case of serious incidents:

1. Any employee or student who witnesses a serious incident has the obligation to report such incident to the University Guard and the Puerto Rico Police or 9-1-1.
2. While the Police and/or 9-1-1 dispatch officers to the scene, the Guard will be on the scene
The University will alert the university authorities according to the order of succession of command cited in document G-0610-033 *Guidelines and standards for the preparation of contingency plans for natural disaster emergencies or other types of disasters*:
 - Senior Unit Executive
 - Dean of Studies
 - Dean of Administration
 - Dean of Students
3. According to the aforementioned hierarchical structure, the executive in charge at the time of the incident will be responsible for issuing an order to the Unit's Information Technology Center to disseminate specific instructions to all members of the university community of that Campus through the existing alert systems, such as *Connect*. When it is most appropriate to evacuate any of the buildings, the same executive will give the order to activate the fire alarms.
4. This executive will have decision-making responsibilities, who will execute the actions or directives issued or who will be in charge of coordinating the necessary resources.
5. Once the crisis has passed, according to the order of hierarchy, the indicated executive will issue the order to disseminate through the existing alert systems the specific instructions for the resumption of university work.
6. The Chief Executive will work in collaboration with the Dean of Business
The student and the CAPI to define the future relationship between the University and the student responsible for the incident.

Annex B

Suggested Content for the Prevention Plan

Any management plan should place special emphasis on the prevention phase, which seeks to identify existing risks and manage them in such a way as to avoid emergency situations and reduce the damage associated with them. An effective prevention plan successfully integrates the information received by different members of the university community, which allows to know exactly the details of a situation and recommends the course of action to follow to stop the disruptive or threatening behavior. Each unit, according to the resources available to it, should develop a Prevention Protocol that may take into consideration the following suggestions, in whole or in part:

1. Mental health promotion

The university can offer its students, faculty and non-teaching employee's workshops, lectures or trainings that educate the community about mental, psychological or emotional conditions that are common in the university population, since for many it is a time of great responsibilities and challenges that can exacerbate existing conditions. The educational sessions will identify existing agencies to support community mental health and make their services available to all.

2. Orientation to the university community on the detection of serial emotional disorders

Workshops will be offered to explain to the community what are the signs of emotional or psychological disorders that warrant special attention and/or case management. Emphasis will be given to the fact that all students must always follow the rules of conduct established in the General Student Regulations, therefore attention will be given to the student's behavior and not to his or her possible mental condition.

3. Incident or case reporting

Safe and easily accessible mechanisms shall be established for reporting conduct that is a source of concern to a member of the community, whether a teacher, student or employee. Among these mechanisms, consideration should be given to occasions when anonymity would be appropriate. Examples include line of assistance, complaint mailbox, contact via email, written report or personal interview with the Dean of Students.

4. Case management

The appropriate university agencies, including the Chaplaincy, the University Counseling Program, and others available in the Unit, will provide support services to the student. The student has the right to receive confidential counseling from the Chaplain or Counselor, but in cases in which the student expresses desires, threats, or future plans to provoke a mild, moderate or serious incident, the person attending the student has the duty to inform the Dean of Student Affairs, so that the CAPI can follow up on the case and make sure that the student's disruptive behavior is channeled or under control.

5. Information integration

The CAPI, under the direction of the Dean of Students, will be the body that integrates the information received through the different existing channels. It is of the utmost importance that all those who are aware of a potentially dangerous situation report it, even anonymously. In their periodic meetings, the members of the CAPI will identify and evaluate the risks and determine the appropriate actions to be taken in each case.

6. Emergency drills

Alarms should be sounded periodically to ensure their proper functioning. Likewise, the community should be familiarized with the evacuation routes of each building and the safe places where they should congregate once they have left the building. The community should be kept informed about the communication systems that can serve as channels for disseminating information in the event of an emergency, such as the Connect system.