



University of Pennsylvania Police Department 4040 Chestnut Street, Philadelphia, Pa 19104		 
Directive: 102	Subject: Campus Behavioral Threat Assessment Process	Effective Date: 11/20/2011
Order of: Gary Williams, Chief of Police		Amended Date: 08/01/2023

I. Purpose

The purpose of this directive is to establish the role of the University of Pennsylvania Police Department (UPPD) and the Division of Public Safety (DPS) in the process of identifying, investigating, evaluating and managing “Concerning Behaviors” (violence, or threats of violence to persons or property that are disruptive to institutional activities) of any individual that indicates proclivity toward, or the potential for, targeted violence which may affect the University of Pennsylvania community (faculty, staff, students, and visitors).

II. Policy

The University of Pennsylvania Division of Public Safety (DPS) is committed to identifying conditions or circumstances that may pose risks to the safety and security to the members of the University community.

Information received by the Division of Public Safety related to affiliates/non-affiliates exhibiting behavior that may pose a threat to the safety of the University community shall be reported to the applicable university resource centers; the Division of Public Safety will actively participate in behavioral threat assessment processes with the University resource centers.

It is the goal of the UPPD and DPS to provide a safe environment for students, employees, visitors and members the University of Pennsylvania community.

III. Scope

This directive shall affect all UPPD and DPS employees.

IV. Procedures

A. Threat Assessment Panel

1. As part of a commitment to provide a safe environment to the members of the University community, the University of Pennsylvania maintains a threat assessment panel consisting

of representatives from various departments and resource centers throughout the University of Pennsylvania.

2. The members of the panel shall hold senior administrative roles with the authority to make policy decisions and commit resources in the core operational areas that are generally responsible for the safety and security of the University community.
3. The panel is comprised of personnel from the following departments/resource centers:
 - a. The Division of Public Safety
 - 1) The University of Pennsylvania Police Department (UPPD)
 - 2) The Division of Public Safety Special Services
 - b. The Division of Human Resources
 - c. University Life
 - d. The Center for Community Standards and Accountability
 - e. Wellness
 - f. Office of General Counsel
 - g. Affected/Associated School representative(s)
4. The panel shall meet as needed based upon the occurrence and/or threats of “Concerning Behavior” by any individual that may affect members of the University Community.
5. The panel shall assess information regarding individuals exhibiting concerning behaviors and will intervene, as appropriate. The panel shall work with internal and external law enforcement and mental health organizations to expedite assessment and intervention; and develop comprehensive fact-based assessments of any individual who may present a threat to the University community.
6. The panel’s mission is to provide a coordinated and planned approach to the identification, assessment, management, and, where possible, reduction and/or prevention of Concerning Behaviors.
7. Specific responsibilities of the panel shall include:
 - a. Facilitating timely communication among various university departments about individual behavioral concerns;
 - b. Investigating or gathering additional information about individuals of concern, including individuals outside of the University community;

- c. Assessing the information so that the University can devise an appropriate response;
- d. Managing interventions, threat management plans, and other case management strategies that connect individuals of concern with needed resources;
- e. Recommending plans for reintegrating a subject once initial actions are complete and the threat eliminated;
- f. Providing a repository for information about behavioral concerns across various campus units so as to identify persons in distress as early as possible;
- g. Assisting with the education of the University community about the types of behavior or concerns that they should report to University members;
- h. Developing policy recommendations based on an evaluation of data on individual behavior dealt with by University personnel.

B. Threat Assessment Process

- 1. The behavioral threat assessment process is in place to allow for proactive intervention by university resource centers before concerning behavior poses a real threat to the University community.
- 2. The threat assessment process shall utilize a fact-based approach and rely primarily on an appraisal of behaviors, rather than on stated threats or traits, as the basis for determining whether there is a need for intervention. In this approach, all aspects of the person(s) of concern must be considered and the sharing of information is critical. The more information available about the person and the concerning behaviors, the more accurate the threat assessment will be.

C. Identifying Concerning Behaviors

- 1. The panel shall focus their efforts in educating and developing the capacity to identify information that indicates there is a risk of violence. Information indicating that an individual is at risk of harming themselves or others should merit immediate attention. A single warning sign by itself usually does not warrant overt action. It should, however, attract the attention of staff that has been sensitized to look for possible indicators. If additional warning signs are present then more fact-finding is appropriate to determine if there is a likelihood of danger.

D. Response Procedures

- 1. Based on the information provided, the panel will make an informed and timely decision on the type of response to be taken by the University.

- a. If the behavior in question is determined to be non-threatening, the matter will be referred to the appropriate department (The Center for Community Standards and Accountability, University Life or Human Resource Services).
 - b. If the behavior in question is determined to be threatening in nature, the panel will devise an appropriate intervention strategy to reduce the threat. Once the potential threat has been assessed the appropriate action will be taken as guided by University policy.
2. The panel will consider all feasible options and seek the most effective and least damaging course of action to intervene and resolve the threat. Options to be considered:
 - a. The UPPD Detective Division or the DPS Department of Special Services may issue a “Priority Response” bulletin for distribution to the relevant DPS departments. The bulletin should contain special instructions regarding an individual whose behavior is considered threatening.
 - b. The panel may determine a need to immediately contact the University of Pennsylvania Police Department (UPPD) if the threat is deemed imminent in nature.
 3. Anyone who reports a potential threat will receive follow-up information from the Point of Contact.

E. Compliance

Violations of this directive, or portions thereof, may result in disciplinary action.

F. Officers Assigned to Other Agencies

Officers of this department assigned to or assisting other law enforcement agencies will be guided by this directive.

G. Application

This directive constitutes departmental policy and is not intended to enlarge the employer’s or employee’s civil or criminal liability in any way. It shall not be construed as the creation of a higher legal standard of safety or care in an evidentiary sense with respect to third party claims insofar as the employer’s or employee’s legal duty as imposed by law. Violations of policy will only form the basis for departmental administrative sanctions. Violations of law will form the basis for civil and criminal sanctions in a recognized judicial setting.