

# POLICY #5.0

## SUBJECT: Threat Management and Safety Intervention

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### I. PURPOSE

This Policy establishes a process for reporting and reviewing violent behavior and threats to physical safety, which potentially or actually pose a risk to persons on campus or in University programs, and other conduct that substantially disrupts University operations. This Policy is intended to implement the authority and responsibilities of the University President and does not confer any additional rights.

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### II. REFERENCES

- A. Southern Utah University [Policy 5.27 Non-Discrimination / Anti-Harassment](#)
- B. Southern Utah University [Policy 5.60 Sexual Misconduct](#)
- C. Southern Utah University [Policy 5.61 Abusive Conduct](#)
- D. Southern Utah University [Policy 5.67 Clergy Act](#)
- E. Southern Utah University [Policy 6.22 Faculty Due Process](#)
- F. Southern Utah University [Policy 8.4 Employment Grievances](#)
- G. Southern Utah University [Policy 11.2 Student Conduct Code](#)
- H. Utah Code [§ 53B-2-106 Duties and responsibilities of the president of a degree-granting institution of higher education -- Approval by board of trustees](#)
- I. Utah Code [§ 53B-3-101 et seq. Enforcement of Regulations at Institutions](#)

- J. Utah Code [§ 76-8-701 et seq. Offenses Against the Administration of Government, Colleges and Universities](#)
  - K. Utah Code [§ 78B-7-101 et seq. Protective Orders and Stalking Injunctions](#)
  - L. Utah System of Higher Education [Policy R220 Delegation of Responsibilities to the President and Board of Trustees](#)
  - M. Utah System of Higher Education [Policy R251 Campus Speakers](#)
  - N. Utah System of Higher Education [Policy R253 Campus Discipline](#)
  - O. Utah System of Higher Education [Policy R831 Minimum Requirements for Non-Faculty Staff Employee Grievance Policy](#)
  - P. Utah System of Higher Education [Policy R841 Minimum Requirements for Disciplinary Sanctions of Staff Personnel Policy](#)
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### III. DEFINITIONS

- A. **Appeal:** A process available to certain Respondents to have the decision reviewed by an applicable University administrator.
- B. **Employee:** A person employed by Southern Utah University.
- C. **Faculty:** See SUU [Policy 6.0 Definition of Faculty](#).
- D. **Hearing:** A process available to certain Respondents to have the decision reviewed first by a panel, who then forwards recommendations and findings to an applicable University administrator.
- E. **Prohibited Conduct:** See below, as defined in Section IV.
- F. **Respondent:** The person reported to have engaged in conduct prohibited by this Policy.
- G. **Retaliation:** Any overt or covert act of reprisal, interference, restraint, penalty, intimidation, against any person or group for participating in any way in the process(es) under this Policy. To be Retaliation, there has to be a causal connection between the

conduct/adverse action and the person's participation in the processes under this Policy. Action is generally deemed retaliatory if it would deter a reasonable person in the same circumstances from participating in the process(es) under this Policy.

- H. **Student:** See SUU [Policy 11.2 Student Conduct Code](#).
  - I. **Supervisor:** Typically, the immediate supervisor of a Respondent-Employee, unless otherwise designated in accordance with this Policy.
  - J. **Visitor:** A person who is not an Employee or Student in the relevant context.
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## IV. POLICY

### A. Scope of Policy

1. The University President, as the Chief Administrative Officer (as designated under state law), has authority to order a person to leave property owned, operated, or controlled by the University as further described in state law and in this Policy. This Policy delegates that authority (as specified below) as it relates to threats, violent conduct, and conduct that substantially disrupts University operations.
  - a. Examples of types of conduct that may constitute threats, violent conduct, and/or conduct that substantially disrupts University operations include but are not limited to:
    - i. When there is reasonable cause to believe that the person intends to or does act to:
      - A. cause injury to a person;
      - B. cause damage to property;
      - C. commit a crime;

- D. interfere with the peaceful conduct of the activities of the University;
- E. violate any rule or regulation of the institution if that rule or regulation is not in conflict with state law; or
- F. disrupt the University, its students, or the University's activities; or

ii. when the conduct is reckless as to whether the person's actions will cause fear for the physical safety of another;

iii. if the person willfully:

A. denies to a student, school official, employee, or invitee lawful:

- 1. freedom of movement;
- 2. use of the property or facilities; or
- 3. ingress or egress to the University's physical facilities;

B. impedes a University employee in the lawful performance of the employee's duties; or

C. impedes a University student in the lawful pursuit of the student's educational activities.

2. This Policy implements the President's authority and prohibits threats to physical safety, violent conduct, and conduct that otherwise substantially disrupts University

operations. It sets out the process to address reported conduct that is prohibited, as set out below. This Policy applies to all conduct regardless of where it occurs to the extent it poses a risk to University property, operations, or to persons on University property or while otherwise in University programs and activities.

3. Abusive conduct is distinct from conduct prohibited under this Policy, and is addressed in SUU [Policy 5.61](#). In the event of any conflict, this Policy shall control and supersede to address threats, violent behavior, and substantially disruptive conduct.
4. Conduct prohibited by this Policy may also be prohibited by other University Policy. As such, applicable University administrators may review conduct under one or more policies, either simultaneously or sequentially, as determined by the University administrators responsible to implement those policies.
  - a. If reported conduct involves a potential violation of SUU [Policies 5.27](#) or [5.60](#), the Director, Equal Opportunity, shall determine in what order and to what extent the University will implement the relevant policies.
  - b. Likewise, the designated decision-maker under this Policy may implement temporary risk management measures/boundaries under this Policy while conduct is evaluated, reviewed, appealed, or otherwise heard under this and/or other policies.
5. Since University conduct processes are separate from criminal or civil litigation, legal outcomes do not affect the University processes nor will pending criminal or civil litigation stop or delay those processes.

B. Prohibited Conduct. The University prohibits Students, Employees, and Visitors from engaging in threats to physical safety, violent conduct, and conduct that substantially disrupts University operations. Such conduct is subject to sanctions and/or risk management measures/boundaries, which are tailored to the

circumstances. By way of example, these may include but are not limited to being ordered to leave or remain away from University property or a part of University property, being prohibited from contacting employees or other persons on campus or in University programs, restrictions on status as a student or employee or participation in University activities. Generally, any measures and sanctions will be coordinated with applicable behavioral and conduct codes applicable to the person whose conduct is at issue, if available and as described below. Additionally, Retaliation against someone for participating in any of the processes or collecting information under this Policy is prohibited.

### C. Reporting Required

1. University Employees are required to report threats to physical safety, violent conduct and conduct that substantially disrupts University operations of which they learn about through, or is in any way related to, their job duties. Employees shall make the report in person, over email, or through other designated reporting form to the Chair of the applicable Behavioral Assessment Team.
2. Reporting Protection Order. Each Employee and/or Student who receives a protective or restraining order (may be referred to as a cohabitant protective order, dating violence protective order, sexual violence protective order, or civil stalking injunction) that lists University-owned or -leased premises as a protected area, or otherwise prohibits the Employee or Student from being within a certain proximity or near another University Employee, Student, or Visitor, is required to provide a copy of such order to the Dean of Students (for orders binding Student) and/or the Human Resources Designee (for orders pertaining to all others), as well as the SUU Police Department.
3. Multiple Reporting Obligations. University Employees may have reporting obligations under multiple policies, including this Policy. For example, in the case of a reported sexual assault, an Employee may have obligations to report under this Policy, SUU [Policy 5.27](#), and SUU [Policy 5.67](#). Who is required to report varies

based on Policy and law. Employees who are required to report must fulfill *all* reporting obligations. And even if an Employee or other person is not required to report, all persons are strongly encouraged to report concerning behavior that potentially poses a physical safety risk to the University or persons on its property or in its programs.

#### D. Team Membership

1. The Behavioral Assessment Teams are chaired by ("Chair"):
  - a. Dean of Students or designee (when reported conduct is by a Student).
  - b. Human Resources Designee (when reported conduct is by an Employee).
  - c. Executive Director, Enterprise Risk Management or designee (when reported conduct is by a Visitor).
2. Other standing Team members for all Teams include representatives from:
  - a. University Police.
  - b. Counseling and Psychological Services.
  - c. Office of Legal Affairs, as legal advisor to the Team.
3. Depending on the circumstances, the Team members may also include situational members:
  - a. Provost's Office (for matters related to Faculty);
  - b. University Housing (for matters related to University Housing);
  - c. Office of Equal Opportunity (for matters relating to discrimination, harassment and sexual assault) or otherwise designee of Vice President, Operations for matters involving allegations of Clery Reportable Crimes (see [Policy 5.67](#));
  - d. Recreation and Wellness;

- e. Faculty or appropriate academic department administrators, as needed;
  - f. Supervisor of the Respondent (see below) when Respondent is an Employee; and/or
  - g. Other University Employees with knowledge of related circumstances that the Chair determines could assist the Team in evaluating the risk.
4. If any Chair or Team member is unable to participate in the convening of the Team, a delegate may attend or the Team may proceed with the Team members available, based on the particular circumstances of a matter.
  5. For any matters involving an Employee-Respondent, typically that Respondent's immediate Supervisor will serve as a situational member of the Team and then act as the Supervisor in the steps outlined below that follow the Team meeting. At times, a Vice President or equivalent level administrator may decide that another employee within or associated with the chain of supervision, other than the immediate supervisor, may serve in the role of Supervisor under this Policy. That decision may be made based on the circumstances of the case, including but not limited to concerns for safety or other potential or actual involvement that would create a unique impact. When matters involve Faculty Respondent(s), the Provost or Provost's designee may determine who will act as the Supervisor. For non-Faculty Respondents, the immediate supervisor will serve as the Supervisor, unless otherwise instructed by the Vice President or equivalent executive administrator who is in the chain of supervision for the Respondent. The Chair may consult with the Provost, Vice President, or other equivalent administrator in deciding who to invite as a situational member of the Team and/or any adjustments needed throughout the process as to who is serving as the Supervisor.

#### E. Team Assessment, Referrals, and Decisions

1. Upon receiving a report of a threat to physical safety, violent conduct, or substantially disruptive conduct, the



Chair makes an initial assessment to determine whether the applicable Team should convene. If based on information available to the Chair, the Chair determines that the reported conduct reasonably could be one or more of the types of prohibited conduct, the Chair will convene the team. All decisions about whether and what conduct occurred under this Policy is done based on a preponderance of the evidence (more likely than not) standard.

2. If the report of conduct **by a Student** warrants further review, the Chair promptly convenes Student Behavioral Assessment Team (BAT).
  - a. The Team gathers to share relevant information and assess the existence, if any, and risks presented and potential risk mitigation measures.
  - b. If the Chair of the Team, after receiving input from other Team members, determines that reported conduct, if true, is a threat to physical safety, violent behavior, or substantially disruptive conduct, then the Chair shares the Team's assessment, including sources, reported facts, level of potential risk, potential risk mitigation measures--all as applicable--with the appropriate administrator (if not part of the BAT) to process under applicable Policy.
  - c. Generally, these matters are referred for processing under SUU [Policy 11.2](#), including that the review and appeal procedures set out in that Policy apply. Additionally, other policies also may apply depending on the nature and circumstances surrounding the conduct. The applicable processes may run simultaneously or sequentially and the review may be conducted for different purposes as set out in those policies. Other applicable policies may include, but are not limited to, SUU [Policy 5.27](#), [Policy 5.60](#), employment policies related to Student

Employees (when applicable), or a housing residential contract.

- d. The administrator(s) carrying out responsibilities under SUU [Policy 11.2](#) may (but is not required to) at any time ask the Student Behavioral Assessment Team to reconvene to provide input on additional, new or different information gathered through the processes under SUU [Policy 11.2](#).
- e. In cases where a Student's threatening, violent, or substantially disruptive behavior is related to a disability, voluntary and involuntary withdrawal procedures and consideration of alternative reasonable accommodations also may apply. The Dean of Students or designee will make the decision to apply such procedures, as applicable, in consultation with the ADA Coordinator or Deputy ADA Coordinator.

3. If the report of conduct **by an Employee** warrants further review, the Chair promptly convenes the Employee Behavioral Assessment Team.

- a. The Team gathers to share relevant information and assess the existence, if any, of the risks and potential risk mitigation measures.
- b. If the Chair concludes, after receiving input from the team, that the reported conduct, if true, could constitute a threat, violent behavior, or substantially disruptive conduct, then the Supervisor of the Employee-Respondent and the Chair of the Team gather any additional relevant information needed.
- c. If the Chair concludes, after receiving input from the Team, that the reported conduct, if true, does not constitute a threat, violent behavior, or substantially disruptive conduct, then the Chair may document that decision and reasoning

without further reach out, unless warranted under other processes or policies.

- d. If the Chair concludes, after receiving input from the Team, that the reported conduct, if true, could constitute a threat, violent behavior, or substantially disruptive conduct, then the Supervisor and Chair provide an opportunity to the Employee-Respondent to meet (in person or virtually at the election of the Supervisor) to explain the perceived deficiencies and alleged policy violation(s) by presenting the relevant information (giving notice), share potential proposed sanctions and risk management measures, as applicable, and providing an opportunity for the Employee to respond. They also may provide the Respondent with information about this Policy, as needed.
- e. The Chair may (but is not required to) reconvene the Team as necessary to receive input about any additional, new, or different information.
- f. After the meeting and taking into consideration all available relevant information including the Employee-Respondent's response and explanations, the Supervisor, in consultation with the Chair, determines what conduct occurred based on the preponderance of the evidence, whether the Employee-Respondent's conduct violated this Policy, and if so, what sanctions and/or risk management measures are imposed on the Employee-Respondent.
  - i. In cases that do not involve the circumstances set out in Section IV.E.3.h. below:
    - A. The Supervisor's decision is made in writing with corresponding reasoning.

B. The Supervisor sends the written decision to the Employee-Respondent on behalf of and as the decision of the University, and to such other University officials with a need to know.

ii. In cases that involve the circumstances set out in Section IV.E.3.h. below, the Supervisor shall follow the same steps for a written decision. Provided however, the Supervisor shall give five (5) business days to Employee-Respondent before the decision is final. If the Employee-Respondent requests a Hearing or Appeal of the decision in writing within those five (5) days by following the steps in Section IV.E.3.h. below, then the process under that subsection will proceed, with a final decision made under that process. If the Employee-Respondent does not request a Hearing or Appeal, then the Supervisor's decision is a final decision of the University at the expiration of the five (5) business days. All other decisions of the Supervisor are final decisions on behalf of the University.

g. In the event that a full-time Faculty member, who is not designated at will by appointment or University policy(ies), is suspended, terminated, or the decision will materially alter the Faculty-Respondent's job duties and/or access to campus based on a violation of this Policy, that Faculty-Respondent may grieve the decision to the Faculty Review Board in accordance with the processes in SUU [Policy 6.22](#). All other decisions

of the Supervisor are final decisions on behalf of the University.

- i. To grieve the decision, the Faculty-Respondent shall submit a Notice of Appeal in writing to the Responsible Administrator (see SUU [Policy 6.22](#)). The Responsible Administrator to receive a Notice of Appeal (the Petition as referenced under SUU [Policy 6.22](#)) for matters under this Policy is the Provost or Provost's designee. That Notice will serve as the Petition for the purposes of SUU [Policy 6.22](#). The Notice of Appeal must meet all of the requirements of a Petition listed in SUU [Policy 6.22](#).
  - ii. If the Faculty-Respondent submits a Notice of Appeal, the Team assessment and decision by the Supervisor under this Policy will serve as the Preliminary Investigation or fact-finding as required in SUU [Policy 6.22](#).
  - iii. Due to the nature of the conduct subject to this Policy, the University, through the Supervisor, may continue to impose risk management measures on a Faculty-Respondent during the pendency of any such proceedings, as well as implement any procedural safety measures needed during implementation of that policy.
- h. In the event that any Employee-Respondent who is not a full-time Faculty member (as defined in SUU [Policy 6.0](#) or other relevant SUU Policy) but is within an employment classification that has access to a grievance procedure under SUU [Policy 8.4](#), is to be terminated, demoted, or their access to campus (or other workspace) materially altered based on a violation of this

Policy as provided in Section IV.E.3.f. above, that Employee-Respondent may request a Hearing or Appeal a decision in accordance with the processes listed below.

- i. Within five (5) working days of receiving a notice of decision by the Chair or Supervisor of a termination, demotion, or material alteration of access to campus (or other workspace), the Employee-Respondent may submit a written request for a Hearing before and Employee Relations Review Committee ("Committee") (see SUU [Policy 8.4](#) for reference to the Committee). The request for Hearing must include the reasons challenging the findings and/or the sanctions/risk management measure(s).
- ii. For purposes of this Policy, the Committee is composed of (a) a Chair of the Team, other than the Chair that serves in Employee-Respondent matters, and (b) at least two (2) other Committee members. The Committee may not include any employees from Human Resources, Counseling and Psychological Services, or the Office of Legal Affairs (except as advisor).
- iii. If the Employee-Respondent elects the Hearing option, the Committee will conduct a Hearing and then, within 20 working days after the conclusion of the Hearing, provide a written report with finding(s) of fact and recommendation(s) to the Cabinet-level Vice President (or equivalent who oversees the Employee-Respondent's department or division) ("Vice President").

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- A. The Committee will include in the Report the findings of fact, based on a preponderance of the evidence, relevant to whether Employee-Respondent engaged in Prohibited Conduct under this Policy. If the facts demonstrate, by a preponderance of the evidence, a violation of this Policy, then the Committee will include recommended risk management measures/sanctions.
  - B. The Hearing follows the same procedures for Committee Hearings set out in SUU Policy 8.4. If there is any question about applicability of procedure to an Employee-Respondent or as applied to the Hearing, a Human Resources employee will determine applicable procedures, with an aim of providing a fair and efficient Hearing. If during a Hearing process the Employee-Respondent fails to participate, the University will proceed with the applicable process based on the information available.
  - C. The Vice President or equivalent level administrator reviews the findings and recommendations and without conducting further hearings, takes one of the following actions:

1. Ratify the findings and adopt the recommendations;
2. Return the report to the Personnel Relations Committee for reconsideration or clarification; OR
3. Reject all or parts of the findings and recommendation(s) and make a final decision as to the finding and risk management measures implemented under this Policy. The Vice President may reject findings or recommendations that are not supported by the record or that are based on a misinterpretation of applicable law or policy.

D. The Vice President or equivalent level administrator shall convey the decision in writing to all parties concerned, as set out for decisions under the Appeal process below.

E. Any risk management measures imposed by the Supervisor's decision will be



implemented and remain in effect during the pendency of the Hearing, as needed under the circumstances.

- iv. An Employee may waive the option to have a Hearing before the Committee, and instead accept the Supervisor's decision by letting the time expire, or request an appeal of the Supervisor's decision by filing a Notice of Appeal with the Cabinet-level Vice President (or equivalent) who oversees the Employee-Respondent's department or division within five (5) days of receiving notice of the decision.
- v. The Employee-Respondent must state in the Notice of Appeal the basis for appeal and any supporting facts and evidence.
- vi. The Notice of Appeal must be submitted no later than five (5) business days following receipt of the Supervisor's written decision.
- vii. Any sanctions or risk management measures imposed by the Supervisor's decision will be implemented and remain in effect during the pendency of the Appeal, as needed under the circumstances.
- viii. Appeals are not a separate assessment of the facts, and Appeals are not granted on the basis of disagreement with the Supervisor's written decision. A Employee-Respondent may Appeal a decision based only on one or more of the following:

- A. There was a denial of adequate and fair due process that resulted in a material error;
- B. The sanction and/or risk management measure imposed was not appropriate for the violation(s) which the Employee was found to have committed; or
- C. There is new evidence or information that was not reasonably available at the assessment or decision which is reasonably likely to materially affect the outcome of the decision.

ix. The Vice President or equivalent level administrator may affirm the decision of the Supervisor, send the matter back for reconsideration or clarification, and/or amend the findings and/or sanctions or risk management measures.

x. The Vice President or equivalent level administrator will provide to the Employee-Respondent a written decision on the appeal within a reasonable timeframe, with an effort to provide it within 10 working days of receipt of the Notice of Appeal.

xi. The decision of the Vice President or equivalent level administrator is made on behalf of the University and is the final decision of the University, not subject to appeal.

xii. If during an Appeal process the Employee-Respondent fails to

participate, the University will proceed with the applicable process based on the information available.

4. If the report of conduct **by a Visitor** warrants further review, the Chair convenes the Visitor Behavioral Assessment Team. This Team follows a process as set out below.
  - a. The Team gathers to share relevant information and assess the existence, if any, of the risks and potential risk mitigation measures. If the Team concludes that reported conduct, if true, is a threat, violent behavior, or substantially disruptive conduct, then the Chair of the Team may proceed with the steps below. If the answer is that the reported conduct does not violate this Policy, even if true, the Chair can refer the matter under policies, document to the file the reasoning, or take other steps that the Chair deems are reasonably necessary; in that case, the Chair does not contact the alleged Respondent-Visitor for purposes of this Policy or otherwise implement measures or sanctions upon the Respondent-Visitor.
  - b. If the Team concludes that the reported conduct, if true, is a threat, violent behavior, or substantially disruptive, the Chair may request a meeting with the Respondent-Visitor, either in person, via electronic means, or in writing, to present the relevant information (giving notice) and provide an opportunity to respond; the Chair may adjust the type of notice or meeting, depending on the circumstances involved. The Chair may also provide the Respondent-Visitor with information about this Policy, as needed.
  - c. After the meeting (or opportunity for a meeting or such other action that the Chair deems is necessary) and taking into consideration all available relevant information including the

Respondent-Visitor's response (if any), the Chair determines what conduct occurred based on a preponderance of the evidence, whether the Respondent-Visitor violated this Policy and if so, what sanctions and/or risk management measures are imposed on the Respondent-Visitor.

- i. The Chair may reconvene the Visitor Behavioral Assessment Team for further evaluation, as needed.
  - ii. The Chair's decision is in writing with corresponding reasoning and risk management measures.
  - iii. The Chair sends the written decision to the Respondent-Visitor on behalf of and as the decision of the University, to the extent possible based on information known about the Visitor, and such other University officials with a need to know.
  - iv. The written decision by the Chair is the decision of the University and is final. There is no appeal of the written decision.
5. Notwithstanding the foregoing, if the reported conduct necessitates immediate risk management measures/boundaries or if opportunity to meet with or contact the person whose conduct is at issue is not readily available, other than through writing, such that the Chair cannot first meet with the Respondent, the Chair may implement those risk management measures/boundaries on a temporary basis and provide the Respondent-Visitor with notice and an opportunity to respond to the allegations as soon as practicable.
6. If a person whose access to University campus or activities is restricted and notification has been sent or otherwise provided to that person by an authorized University official, violates that restriction(s) and enters or

remains on property that is owned, operated, or controlled by the University, they are subject to arrest and prosecution for criminal trespass, based on state law.

- F. Criteria when Assessing Risk. When assessing the risk, the Team and the decision-makers under this Policy conduct an individualized assessment, considering the reported facts and the following non-exhaustive list of factors (among others):
1. Whether the reported conduct, if true, is a threat to physical safety, violent conduct, or conduct that substantially disrupts University operations;
  2. The nature, duration, and severity of the reported conduct;
  3. The probability that potential injury and/or harm will occur within the University's control;
  4. Whether the person substantially impeded the educational process or functions of other members of the University community;
  5. Whether the circumstances suggest an increased risk that the person will commit an additional act of violence/disruption;
  6. Whether the person has a history of violence or disruption (conviction history, previous school discipline, prior disruptions, escalating conduct, etc.);
  7. Whether the person is alleged to have made threats of further violence against the person(s) impacted or any other individual;
  8. Whether the act of violence was committed by more than one person;
  9. Whether the circumstances suggest there is increased risk of future acts of violence under similar circumstances;
  10. Whether there was use of a weapon or drugs given; and

11. The age of the person who allegedly experienced the conduct.
- G. Due Process. Under any of the above processes, no final determination is made about whether the person has engaged in threats, violent behavior or substantially disruptive conduct until that person receives notice and an opportunity to be heard in accordance with the applicable Policy, either under this Policy or other applicable Policy, as set out above. Provided however, as set out above and in other applicable Policy, the University retains authority to implement temporary risk management measures/boundaries and provide the requisite level of due process as soon as practicable thereafter.
- H. No Additional Rights. This Policy is implemented to implement state law that grants authority to the President related to campus safety. It is not intended to and does not create any additional rights or contractual obligations beyond what is required by applicable law.
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## V. RELEVANT FORMS/LINKS

- [How Do I Report an Issue?](#)
  - [Student voluntary and involuntary withdrawal procedures](#)
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## VI. QUESTIONS/RESPONSIBLE OFFICE

The responsible offices for this Policy are the [Provost's Office](#), [Student Affairs](#), and the [Vice President of Operations](#), as applicable. For questions about this Policy, contact the [Dean of Students](#), [Human Resources Designee](#), or the Executive Director of [Enterprise Risk Management](#), as applicable.

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## VII. POLICY ADOPTION AND AMENDMENT DATES

**Date Approved:** October 18, 2021 [as temporary authorization]; [December 2, 2021](#) [as permanent authorization]

**Amended:** [July 18, 2022](#) [as temporary authorization]; [September 23, 2022](#) [as permanent authorization]; September 14, 2023 [temporary authorization until February 11, 2024]

FORMER POLICY  
DO NOT USE