



Behavior Assessment and Intervention Program

Internal Audit Report No. R2106
March 10, 2021



Executive Summary

Audit Objective: To review the behavior assessment and intervention program process for effectiveness.

Conclusion: Based on the audit procedures performed, the behavior assessment and intervention program is effective and conforms to national standards. Opportunities exist to enhance the existing program by formalizing certain policies and procedures.

Observations by Risk Level: Management has reviewed the observation and has provided responses and anticipated implementation dates.

Observation	Risk Level	Management's Implementation Date
Formalize Policies and Procedures	Medium	04/30/2021

For details, engagement methodology, and explanation of risk levels, please see the attached report.



Observation #1: *Formalize Policies and Procedures*

Medium:

Without documented policies and procedures, stakeholders may not be aware of their responsibilities and unauthorized personnel may view or expose confidential data. This could lead to reputational risks and potential campus safety issues.

Standard 9 of the National Association for Behavioral Intervention and Threat Assessment Standards states that behavior assessment and intervention teams should have a policy and procedure manual that is updated each year to reflect changes in policy and procedures. The UT Dallas program does have a manual; however, some policies and procedures should be formalized into the existing manual. For example:

- a. There are no written procedures for adding access or for locking access within the BAIT portion of Maxient when a user transfers or terminates employment.
- b. There are no written procedures regarding confidentiality agreements for non-member BAIT personnel and/or for all BAIT members within a remote environment. A student intern had access to sensitive BAIT information and had not signed any affirmation indicating they understand their obligation of confidentiality. The intern did receive the BAIT manual. Confidentiality agreements should be signed by all users and maintained in a central location.
- c. Real-time Immediate threat and/or disruptive behavior (for example: hospitalizations and/or wellness checks) communication and escalation process also needs to be documented.
- d. A policy allowing the university to force the withdrawal of a student, in unique circumstances, who exhibits serious harm to self/others has been drafted and will undergo the approval process and legal review. Of note, the UT Dallas policy will become a model for the UT System.

Recommendation: Consider formalizing policies and procedures regarding access, confidentiality agreements, escalation processes, and involuntary withdrawal.

Management's Action Plan: Formalize BAIT handbook into an official policy and procedure manual that will include, among other things, the addition of:

- An outline of the process used to 'lock' users out of the conduct software (Maxient) when they no longer have an educational need for access.
- Procedures for educating all individuals who work with BAIT cases on the importance of confidentiality and include a copy of the confidentiality agreement that these individuals must sign. **Additionally, the signed confidentiality agreements will be stored electronically in the Maxient conduct software.**
- Include the threat assessment evaluation tool and procedures for assessing risk used by the BAIT threat assessment team. This section will include strategies for addressing students in crisis who are at immediate risk of harming themselves or others.

The administrative withdrawal policy currently in progress is unique to the UT System as there are no existing policies of this kind at any of the System institutions. The approval of this policy will be at the discretion of the UT Dallas HOP committee and will also have to be approved at



the System level. If we are successful in getting this policy approved, it will be included in the policy and procedure manual.

Person Responsible for Implementation: Dr. Amanda Smith, Associate VP and Dean of Students

Estimated Date of Implementation:

- The policy and procedure manual will be finalized by April 30, 2021
- The administrative withdrawal policy is written and has been advanced to UT Dallas attorneys. The date of implementation will depend on the pace of the approval process.



Appendix A: Methodology

Background

As outlined in UTDSP5008¹, *Behavior Assessment and Intervention Team (BAIT)*, the purpose of the team is to review behavioral incidents and assist in the development of a strategy to address situations involving students whose behavior may be disruptive or harmful to the campus community. The leadership team is co-chaired by the Vice President for Student Affairs and Dean of Students while the core team is chaired by the Assistant Director from the Office of Community Standards and Conduct. Team members include, but are not limited to, the following:

- Dean of Students
- Dean of Undergraduate Education
- Director of the Student Counseling Center
- Chief of Police
- Associate Deans of Students
- Director of Residential Life

Controls and Strengths

In general, the process follows best practices as outlined in the National Association for Behavioral Intervention and Assessment.

- Membership in the team consists of appropriate personnel, and they meet regularly to address active cases.
- A formal university policy is in place that establishes the purpose and responsibilities of the BAIT, operations and procedure guidelines, and confidentiality procedures.
- There is a BAIT website that provides information regarding the process, members, forms, and confidentiality.
- Team members receive training on an ongoing basis.

Scope and Procedures

The scope of this audit was calendar year 2020, and our fieldwork concluded on February 8, 2021. To satisfy our objectives, we performed the following:

- Gained an understanding of the process by interviewing responsible parties, including BAIT members.
- Reviewed various policies, procedures, and standards related to BAIT.
- Conducted a risk assessment of the process and narrowed the audit procedures as follows:

¹ <https://policy.utdallas.edu/utdsp5008>



- Reviewed the processes and assessed them for key best practices outlined in the National Association for Behavioral Intervention and threat Assessment (NaBITA) Standards.
- Determined if appropriate access was granted to the BAIT system (Maxient).
- Determined if team members received the appropriate training on procedures, policies, and protocols in line with their responsibilities.
- Determined if feedback was received from BAIT users.

We conducted our examination in conformance with the Texas Internal Auditing Act and in conformance with the guidelines set forth in The Institute of Internal Auditor’s *International Standards for the Professional Practice of Internal Auditing*. The *Standards* are statements of core requirements for the professional practice of internal auditing.

Follow-up Procedures

Though management is responsible for implementing the course of action outlined in the response, we will follow up on the status of implementation subsequent to the anticipated implementation dates. Requests for extension to the implementation dates may require approval from the UT Dallas Audit Committee. This process will help enhance accountability and ensure that timely action is taken to address the observations.

Thank You

We appreciate the courtesies and considerations extended to us from members of the Behavior Assessment and Intervention Team and Student Affairs during our engagement. Please let me know if you have any questions or comments regarding this audit.

A handwritten signature in blue ink that reads "Toni Stephens".

Toni Stephens, CPA, CIA, CRMA
Chief Audit Executive



Appendix B: Report Distribution

<p style="text-align: center;">Members of the UT Dallas Institutional Audit Committee</p> <p><i>External Members</i></p> <ul style="list-style-type: none"> • Ms. Lisa Choate, Chair • Mr. Gurshaman Baweja • Mr. John Cullins • Mr. Bill Keffler • Ms. Julie Knecht <p><i>UT Dallas Members</i></p> <ul style="list-style-type: none"> • Dr. Richard Benson, President • Dr. Rafael Martin, Vice President and Chief of Staff • Dr. Kyle Edgington, Vice President for Development and Alumni Relations • Mr. Frank Feagans, Vice President and Chief Information Officer • Dr. Gene Fitch, Vice President for Student Affairs • Dr. Calvin Jamison, Vice President for Facilities and Economic Development • Dr. Inga Musselman, Provost and Vice President for Academic Affairs • Ms. Sanaz Okhovat, Chief Compliance Officer • Dr. Joseph Pancrazio, Vice President for Research • Mr. Terry Pankratz, Vice President for Budget and Finance • Mr. Timothy Shaw, University Attorney, ex-officio 	<p style="text-align: center;">UT Dallas Responsible Parties</p> <p><i>Responsible Vice President (VP)</i></p> <ul style="list-style-type: none"> • Dr. Gene Fitch, VP for Student Affairs <p><i>Persons Responsible for Implementing Recommendations</i></p> <ul style="list-style-type: none"> • Dr. Amanda Smith, Associate VP and Dean of Students <p><i>Other Relevant Persons</i></p> <ul style="list-style-type: none"> • Dr. Diego Garcia Theodore, Assistant VP Student Affairs <p style="text-align: center;">External Agencies</p> <p><i>The University of Texas System</i></p> <ul style="list-style-type: none"> • System Audit Office <p><i>State of Texas Agencies²</i></p> <ul style="list-style-type: none"> • Legislative Budget Board • Governor’s Office • State Auditor’s Office
<p>Engagement Team Project Leaders: Joshua Bennett and Jesson Gil, Staff Auditors</p>	

² Per Texas Internal Auditing Act Requirements



Appendix C: Definition of Risks

Risk Level	Definition
Priority	High probability of occurrence that would significantly impact UT System and/or UT Dallas. Reported to UT System Audit, Compliance, and Risk Management Committee (ACRMC). Priority findings reported to the ACRMC are defined as <i>“an issue identified by an internal audit that, if not addressed timely, could directly impact achievement of a strategic or important operational objective of a UT institution or the UT System as a whole.”</i>
High	Risks are considered to be substantially undesirable and pose a moderate to significant level of exposure to UT Dallas operations. Without appropriate controls, the risk will happen on a consistent basis.
Medium	The risks are considered to be undesirable and could moderately expose UT Dallas. Without appropriate controls, the risk will occur some of the time.
Low	Low probability of various risk factors occurring. Even with no controls, the exposure to UT Dallas will be minimal.