



TEXAS

The University of Texas at Austin

Behavioral Assessment Processes

Office of the Dean of Students

January 2025

Office of Internal Audits

UT Austin's Agents of Change



Executive Summary

Behavioral Assessment Processes

Office of the Dean of Students

Project Number: 24.005

Audit Objective

The objective of this audit was to determine whether The University of Texas at Austin’s (UT Austin) behavioral assessment processes promote timely and effective interventions and necessary ongoing monitoring.

Conclusion

Overall, student behavioral assessment processes promote timely and effective interventions and generally conform to national standards for case management. However, there are opportunities to enhance internal processes related to case monitoring and continued support for students returning to the University after a medical withdrawal. Additionally, there is an opportunity to formalize the Behavioral Assessment Team’s (BAT) framework and institutional charge.

Audit Observations¹

Recommendation	Risk Level	Estimated Implementation Date
Ongoing Monitoring	High	September 2025
BAT Framework and Institutional Charge	Medium	September 2025
Sustained Support for Returning Students	Medium	September 2026
FERPA Training	Medium	August 2025

Engagement Team

Ms. Autumn Gray, Assistant Director, CIA
Ms. Melanie Tolen, Senior Auditor, CPA

¹ Each observation has been ranked according to The University of Texas System Administration (UT System) Audit Risk Ranking guidelines. Please see the last page of the report for ranking definitions.



Detailed Audit Results

Observation #1 - Ongoing Monitoring

The Behavioral Assessment Team (BAT) does not have a documented process for ongoing monitoring of cases reviewed by the team. After the initial review and risk rating, the assigned Student Outreach and Support (SOS) case manager coordinates interventions and conducts all necessary follow-up. The BAT does not generally review high-risk cases² again unless new information is obtained that increases the risk rating.

While high-risk cases typically remain on the case manager’s radar until the end of a semester, tracking is done at the discretion and availability of the case manager. Ongoing monitoring by the BAT can help ensure that the student remains at a reduced risk level and is not demonstrating additional concerning behaviors.

The National Association for Behavioral Intervention and Threat Assessment (NABITA) standards require behavior intervention teams use a written and formalized case review protocol to document the need to keep a case active, engage in case monitoring, or move a case to closed status.

Recommendation: The Dean of Students (Dean) should develop and document a process for ongoing monitoring of high-risk students and follow-up with the BAT.

Management’s Corrective Action Plan: The Office of the Dean of Students will consult with TNG Consulting from December 2024 to April 2025 to determine appropriate changes to the current monitoring process. The Office of the Vice President for Legal Affairs will review final changes to ensure compliance before implementation. The changes will occur during the summer 2025 session and will include training with TNG for the Behavior Assessment Team.

Responsible Person: Executive Director of Student Support

Planned Implementation Date: September 1, 2025

Notable Practice

The College Liaison Program assigns Student Outreach and Support (SOS) case managers to specific colleges and schools. If there are significant incidents or if additional outreach is needed, the assigned case manager has specialized knowledge of the area and is a direct contact for the college/school. Since its inception, information sharing and outreach between the colleges and SOS has improved, and case managers are better able to provide appropriate and up-to-date information to students.

² The most serious student cases on campus, rated as “elevated” or “critical” on a standardized scale.



Observation #2 –BAT Framework and Institutional Charge

UT Austin does not have an official institutional policy or charter defining the BAT’s purpose, mission authority, or membership. Additionally, the team does not have documented standard operating procedures, onboarding processes, or member training requirements. The BAT has operated under a Vice President for Student Affairs (VPSA) mandate since its inception, and members have historically been selected by the VPSA to provide expertise and resources from their respective areas. As a result, the team does not have an official institutional charge or authority, documentation about and within the team is limited, and knowledge of processes and procedures is only held by a few individuals.

Although the BAT has generally consistent processes and case management, an official institutional charge, documented procedures, and enhanced training reduces the risk of inconsistency in the provision of care and support of each student of concern. Additionally, NABITA standards emphasize the need for a written institutional policy that establishes and authorizes the team and sets its mission, membership, and scope. Standards also call for a written procedure manual and an annual professional development schedule.

Recommendation: The Dean should consult with the Office of the Vice President for Legal Affairs and University (VPLA) leadership to determine the appropriate method of formalizing a BAT framework (e.g., policy, charter, etc.). Additionally, the Dean should develop and document standard operating procedures and outline committee member onboarding and professional development requirements.

Management’s Corrective Action Plan: The Office of the Dean of Students will discuss if a charter or policy is most appropriate for the Behavior Assessment Team in spring 2025. Once the decision has been determined, the Office of the Dean of Students will work with TNG Consulting to finalize the appropriate response. The final documents (i.e., policy/charter and standard operating procedures) will be reviewed by VPLA and once vetted, will be shared with the Behavior Assessment Team for the beginning of the 2025-2026 academic school year.

Responsible Person: Executive Director of Student Support

Planned Implementation Date: September 1, 2025

Observation #3 Sustained Support for Returning Students

UT Austin does not have a process to inform BAT team members or SOS case managers when high-risk students who have withdrawn from the University for medical reasons are re-enrolled. The Office of the Registrar does not track students’ reasons for withdrawing, so there is no mechanism to alert SOS or the BAT when students return to campus. Because of the lack of process, case managers cannot follow up with these students or provide sustained support.³

³ In academic year 2023-24, there were 126 medical withdrawals, of which 112 were because of mental health.



Students who transition back to campus may be subject to further mental health challenges and academic difficulties without sustained support.

Additionally, the Council for the Advancement of Standards (CAS) in Higher Education requires case management services (e.g., SOS) to identify their role in the process for student withdrawals involving medical or extenuating circumstances, as well as returning to campus after a leave of absence.

Recommendation: The Dean should work with the Office of the Registrar, University Health Services, and other campus units as needed to develop a process that will identify students who return to campus after a medical withdrawal. Additionally, the Dean, in partnership with the colleges, should develop a process to provide necessary support to these students.

Management's Corrective Action Plan: It is vital to assess and determine what current operations occur for students medically withdrawing by departments/colleges. Healthyhorns, Disability and Access, and the academic colleges oversee medical withdrawals, which accounts for the 126 medical withdrawals during the 2023-2024 academic year. During the first half of each semester, students can withdraw from their academic college without notating any reason. Currently, those students have different processes, support and resources based on their individual academic college and the Registrar. During the 2025-2026 school year, the Office of the Dean of Students will partner with these campus areas to review the current process and determine if including the Office of the Dean of Students is appropriate in this process for students. Benchmarking of sister institutions will also occur during the 2025-2026 school year. Once the information has been reviewed and assessed by the key partners, an implementation plan will be developed for the 2026-2027 academic year. This review may determine that the Office of the Dean of Students is not the appropriate department for this work due to potential duplication of services.

Responsible Person: Executive Director of Student Support

Planned Implementation Date: September 1, 2026

Observation #4 FERPA Training

The Office of the Dean of Students does not require BAT team members to take Family Educational Rights and Privacy (FERPA) training and does not have a process to ensure administrative staff receive the training. We identified multiple BAT members and Dean administrative staff who had not completed FERPA training. The University of Texas System Policy 183, *Maintenance of Education Records Subject to FERPA*, requires UT Austin faculty and staff to take a FERPA training course if their role requires access to student records. However, if an employee does not directly access systems containing student records, UT Austin does not automatically assign this training. Although Dean administrative staff, as well as some BAT members do not access systems containing student records, sensitive student information (i.e., student records) is collected by the Dean and discussed at BAT meetings. Failure to adhere



to FERPA can result in inadvertent disclosure of student records and/or legal and financial repercussions for the University.

Recommendation: The Dean should require all administrative staff be assigned the FERPA training course; additionally, require and confirm FERPA training for BAT members.

Management’s Corrective Action Plan: The Office of the Dean of Students will implement a standard operating procedure to ensure all professional and student staff complete FERPA training in line with the compliance recommendations. The Behavior Assessment Team will be required to take FERPA training by August 1, 2025, and will be required to maintain compliance. This will be noted in the new charter/policy that is referenced in observation two.

Responsible Person: Associate Vice President for Student Affairs and Dean of Students, and Executive Director of Student Support

Planned Implementation Date: August 1, 2025

Additional Risk Considerations

Team Consolidation

In addition to the BAT, UT Austin has a behavior assessment team for faculty, staff, and others (Behavior Risk Assessment Committee, or BRAC). Some members of BAT also serve on the BRAC, and there is overlap when students also serve as employees or when issues arise between employees and students. The Dean should consider combining the teams to standardize the University’s behavioral assessment processes and improve operational efficiencies. NABITA standards call for one integrated team that addresses early intervention cases as well as threat assessment cases.

Conclusion

Overall, student behavioral assessment processes promote timely and effective interventions and generally conform to national standards for case management. However, there are opportunities to enhance internal processes related to case monitoring and continued support for students returning to the University after a medical withdrawal. Additionally, there is an opportunity to formalize the BAT’s framework and institutional charge.

Table: Controls Assessment

Audit Objective	Controls Assessment
Determine whether the University’s behavioral assessment processes promote timely and effective interventions and necessary ongoing monitoring.	Generally effective with high and medium-risk opportunities



Background

Since 2009, UT Austin’s threat assessment team has evolved in structure and scope based on research and best practices, and the team strives to comply with national standards. Currently, the BAT functions as a trained, interdisciplinary resource team that meets weekly to discuss students exhibiting distressing behaviors. Team members collaborate to assess the behaviors of students who pose a risk of harm to themselves or the university community, providing appropriate resources and interventions to deescalate situations and reduce the risk of harm.

SOS manages student cases discussed by the BAT and operates the reporting tool (Behavior Concerns and Advice Line (BCAL)). Additionally, SOS handles lower-risk behavioral concerns by offering outreach, interventions, support, and referrals to campus and community resources. The director of SOS and the executive director of student support co-chair the BAT.

Scope, Objectives, and Methodology

This audit was conducted in conformance with The Institute of Internal Auditors’ *International Standards for the Professional Practice of Internal Auditing*. Additionally, we conducted the audit in accordance with Generally Accepted Government Auditing Standards and meet the independence requirements for internal auditors. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions on our audit objectives.

The scope of this review included the behavioral assessment processes for students during academic year 2023-2024.

Specific audit objectives and the methodology to achieve the objectives are outlined in the table below.

Table: Objectives and Methodology

Audit Objective	Methodology
Determine whether the University’s behavioral assessment processes promote timely and effective interventions and necessary ongoing monitoring.	<ul style="list-style-type: none"> • Interviewed key personnel and conducted process walk-throughs. • Attended BAT meetings and reviewed documentation to understand policies and procedures. • Identified behavioral assessment tools and training and verified that the training was appropriate and complete. • Tested a sample of SOS and BAT cases to verify that case management



	<p>followed best practices and documented procedures.</p> <ul style="list-style-type: none"> • Conducted a gap analysis of current SOS and BAT processes against national standards. • Researched peer processes to identify key common characteristics and best practices.
--	---

Criteria

- UT Austin Student Emergency Services Manual
- Council for the Advancement of Standards in Higher Education (CAS) for Case Management Services, Part 2, *Program and Services*
- National Association for Behavioral Intervention and Threat Assessment (NABITA) Standards for Case Management, Part 2, *Process Elements*
- NABITA Industry Standards for Behavior Intervention Teams

Observation Risk Ranking

Audit observations are ranked according to the following definitions, consistent with UT System Audit Office guidance.

Risk Level	Definition
Priority	If not addressed immediately, has a high probability to directly impact achievement of a strategic or important operational objective of The University of Texas at Austin (UT Austin) or the UT System as a whole.
High	Considered to have a medium to high probability of adverse effects to UT Austin either as a whole or to a significant college/school/unit level.
Medium	Considered to have a low to medium probability of adverse effects to UT Austin either as a whole or to a college/school/unit level.
Low	Considered to have minimal probability of adverse effects to UT Austin either as a whole or to a college/school/unit level.

In accordance with directives from UT System Board of Regents, Internal Audits will perform follow-up procedures to confirm that audit recommendations have been implemented.



Report Submission

We appreciate the courtesy and cooperation extended throughout the audit.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Sandy Jansen".

Sandy Jansen, CIA, CCSA, CRMA, Chief Audit Executive

Distribution

Dr. Jay C. Hartzell, President

Ms. Amanda Cochran-McCall, Vice President for Legal Affairs and General Counsel

Mr. Thomas Dison, Interim Vice President for Student Affairs

Mr. Jeff Graves, Chief Compliance Officer and Privacy Officer

Ms. Tessa Green, Chief of Staff, Office of the Vice President and Provost

Ms. Katie McGee, Associate Vice President for Student Affairs and Dean of Students

Dr. Rachel Davis Mersey, Executive Vice President and Provost

Ms. Christy Sobey, Director of President's Office Operations

Dr. Kelly Soucy, Executive Director of Student Support, Office of the Dean of Students

The University of Texas at Austin Institutional Audit Committee

The University of Texas System Audit Office

Legislative Budget Board

Governor's Office

State Auditor's Office