### College and University Campus Violence – Understanding and Managing the Risk

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## "Minnesota school shooter killed 7 in 3 minutes"

"90 seconds of gunfire – and panic"

"Hoax threat unnerves students at San Diego State University"

"Student arrested in fatal shooting near Fresno State"

"Accounts of terror and survival amid gunfire"

"Deadliest day on U.S. campus"

"A campus in anguish"

Sensational headlines chronicling cases of school violence in the United States, have appeared all too frequently in the past few years. Schools are required to develop critical incident or disaster preparedness plans and processes to address the behavioral risk of school violence. Many colleges and universities, however, neglect to give campus violence a high enough priority in their annual risk planning process. These schools may believe that preparation for natural disasters is sufficient to keep them safe. This belief may stem from misunderstanding and misconceptions about the nature of school violence.

## **Misunderstanding and Misconceptions**

Today, employees and students are familiar with the term "school violence." When asked to define school violence, they may resort to comments like, "You mean someone going postal and shooting up the place?" Now they refer to, "a Columbine or Virginia Tech." Until recently, the name Columbine was seared into most Americans' memory as the bloodiest shooting spree in American schools. Eight years later, Virginia Tech has become associated with bloody school rampages. Although it is true that these two tragedies have received the most publicity, they are only two of the more than 37 targeted, on-campus school shootings in United States schools. According to a study by the U.S. Secret Service and the U.S. Department of Education\* these other 37 shootings occurred in U.S. secondary schools from 1974 to 2000 and recommended Threat Assessments to increase campus security. Attending to only the sensationalized, horrific school shootings, results in school employees and students misunderstanding the broader scope and true impact of school violence and forming misconceptions about such violence. For example, one common misstatement is, "Violent incidents don't or won't happen at our school." Other comments include, "Our school is in a nice, safe area of town," "Our school only hires quality employees," "Our students come from respectable families," or, "Our school is not engaged in high-risk activities." Comments like these reflect a belief that school violence, like



workplace violence is too random and unpredictable for schools to validate the expenditure of time and money on prevention efforts.

Misinformed individuals that make these kinds of statements are either in denial or have not been exposed to the multitude of ways in which violence can negatively affect reaching the institution's goals while preserving their vision and mission goals. Granted, school campuses are statistically considered one of the safest places for students. When this type of incident occurs, however, the outcome is devastating in loss of life, interruption in school business and decline in employee and student morale. There are legal consequences that invariably follow school violence. All of these will have long-term effects on the institution. For some small to medium sized colleges, this kind of event can have a long-term affect on their ability to survive as a desired destination for students.

These headline making incidents are dramatic and receive a great deal of coverage, but they are only part of the school violence issue. There are also many less obvious but inappropriate behaviors, actions, statements, events and incidents, which are often not understood or considered when evaluating the potential risk of campus violence. Because of the many ways in which violence can affect the campus, no school is immune to the risk. School campus violence can and does affect institutions large and small; in large cities and smaller college towns.

Another common misconception is that most of the school's efforts should be directed to the response during a campus shooting or other violent incident. In fact, however, the majority of an institution's efforts should actually be expended in preplanning, training for a crisis management team, violence policy development, use of threat assessment professionals and training of employees and students to mitigate the risk and lessen the impact of an incidence involving violence.

### Scope of the Problem - Campus Crime Statistics

In 2002 there were approximately 16 million students enrolled in 4,200 colleges and universities (U.S. Department of Education, 2002). The study of campus victimization was mandated by the Violence Against Women Act (1994). Data gathered from a representative sample of households in the U.S. regarding crimes reported and not reported to police is gathered by the National Crime Victimization Survey (NCVS). Since 1995, the Bureau of Justice Statistics has included items to the survey regarding student victims of crime.

Although there is usually a lag of a few years in reporting crime victim data, the most recent information regarding college students from the Bureau of Justice Statistics indicates the rates of



serious violent crime (rape/sexual assault, robbery and aggravated assault) declined from 1995 to 2002 for college students (and non-students)

The following summarizes statistics regarding campus crime as reported by the American College Health Association in *Campus Violence White Paper* (February 5, 2005) and the U.S. Department of Justice, Bureau of Justice Statistics *Special Report – Violent Victimization of College Students, 1995-2002* (2005):

- 41% of offenders were perceived to be under the influence of drugs or alcohol
- Firearms were present in 9% of all violent crimes, 8% of assaults, and 31% of robberies against college students; weapons were present in 34% of all violent college student crimes
- Nationwide (2002), 8% of men and 1% of women had working firearms on campus
- 21% of faculty, staff and students feared for their physical safety because of their sexual orientation
- In 2004, 7% of students were in a physical fight and 4% were physically assaulted
- In 2004, nearly 19% of students who drank alcohol reported being physically injured
- As of 2002, an estimated 1,400 college students were dying each year from alcoholrelated injuries
- 56% of on-campus violence against students occurred during the day, 6 a.m. to 6 p.m.
- Male college students were twice as likely to be victims of overall violence than female students (80 versus 43 per 1,000)
- White college students had higher rates of violent victimization than students of other races
- Strangers committed 58% of all violent crimes against student victims
- 15-20% of female college students have experienced forced intercourse (rape)
- 5-15% of college men have indicated forced intercourse
- Simple assault accounted for 63% of college student violent crimes, while rape/sexual assault accounted for around 6% (only 5% of completed/attempted rapes were reported)
- Non-strangers (known to student victims) committed 79% of the rape/sexual assaults
- Alcohol and other drugs were implicated in 55-74% of sexual assaults on campuses

Employees and others on campus besides the students are also affected by workplace violence. According to widely accepted statistics, workplace violence is having a major impact on the U.S. A few alarming statistics for employees:

• Annually, there are over 1.7 million incidents of workplace violence

- Workplace homicide has been described as the fastest-growing form of homicide in the country
- The leading cause of death on the job for women is homicide
- The leading cause of death on the job for men is homicide
- Eighty seven percent of the perpetrators of violence are male
- Corporate America spends an estimated \$4.2 billion to \$6.4 billion per year in the aftermath of workplace violence.

Sources of the statistics for general workplace violence used above: Northwestern Mutual Life Insurance Study on Workplace Violence, U.S. Department of Justice, U.S. Department of Health and Human Services, U.S. Department of Labor, National Safe Workplace Institute, National Institute for Occupational Safety and Health (NIOSH).

## **Costs Associated with Campus Violence**

Colleges and universities can face significant costs in the aftermath of a major campus incident:

- Increased security
- Building repair
- Campus business interruption
- · Loss of productivity for students and employees
- Lost time; classes may need to be cancelled
- Employee or student turnover
- Increased workers compensation claims for employees
- Increased medical claims; more visits to student health services
- Litigation expenses
- Legal issues:
  - o Negligent hiring
  - o Negligent training
  - o Negligent supervision
  - o Negligent retention
  - o Negligent security
  - o Negligent response
  - o Negligent termination
  - o Negligent recommendations

## Why Take a Proactive Approach?

Colleges and universities take a proactive approach to managing violence for a variety of reasons. These include a close call with an out-of-control employee or student, significant other or outsider. Some institutions are aware of their high costs in the aftermath of a violent incident. Others consider federal or state compliance issues and OSHA guidelines or the risk of litigation. In many cases, institutions simply believe it is the right thing to do for the safety of employees and students. These institutions understand that properly addressed, behavioral risk management can have a positive effect on their overall operations to meet their educational goals.

### Violence from Internal and External Sources

Too often there is misunderstanding about what can or should be done to reduce and manage the risk of violence on campuses. The good news is that much can be done to reduce the risk. When developing a plan to manage and lessen the impact of school violence, a good place to start is with a definition:

School violence is any incident that could increase in intensity and threaten the safety of any employee, student or outsider on campus; have an impact on the physical or psychological wellbeing of any employee, student or outsider, cause damage to school property or interrupt normal campus operations.

As is evident from this definition, violence can and does affect the campus in a variety of ways. Although extreme employee or student-on-employee or student violence most often makes the headlines, there are four types of perpetrators and varying actions to consider when developing a plan to manage the risk of campus violence.

**Type I Perpetrators** are individuals or groups that have no legitimate relationship to the campus. They usually enter the campus to commit a robbery, rape or other criminal act. Terrorist acts involving the campus may be considered Type I.

**Type II Perpetrators** are clients (students) who are either the recipient or the object of services or products provided by the organization or have a legitimate relationship with it (for example students, vendors, contractors or visitors). The risk of violence could result from enraged, out-of-control students, contractors or visitors.

**Type III Perpetrators** are individuals who have an employment relationship with the organization, as a current or former employee, supervisor or manager. Some of the risks include harassment, romantic obsession, fighting, suicide and physical retaliation after discipline or termination.



**Type IV Perpetrators** are individuals who have a personal relationship with a current or former employee and are usually a friend, acquaintance, relative, boyfriend, girlfriend or domestic partner. Romantic triangle conflicts, domestic violence and stalking can arise from these perpetrators.

## Type I Violence

No legitimate relationship to the campus (thieves, extremists, vandals) **Risk:** Robbery, terrorism, vandalism, etc. **Proactive/Reactive Actions** Hard Targeting

- Vulnerability assessment
- Structural deterrents
- Live or electronic security, video surveillance
- Training, safety issues, safe conduct policies
- Threat assessment advisor

**Disaster Preparation/Business Continuation Plans** 

## **Type III Violence**

Employment relationship with the campus (current or former employee) Risk: Fighting, termination retaliation, harassment,

etc.

# Proactive/Reactive Actions

Internal/external issues

- Crisis Management Team
- Violence policy
- Threat assessment advisor
- Emergency response plan
  Training (parky threat record)
- Training (early threat recognition, reporting, etc.)
- Customer considerations
- Disaster Preparation/Business Continuation Plans

#### Type II Violence Legitimate relationship to the campus from outside (customers, vendors, contractors) Risk: Enraged customers/clients, vendors/contractors Proactive/Reactive Actions Customers

- Employee training (difficult/enraged customers)
- Visible deterrents
- Threat assessment advisor
- Vendors/Contractors
  - Compliance with company policies
  - Training
  - Threat assessment advisor

## Type IV Violence

Personal relationship with current or former employee/student (boyfriend, girlfriend, domestic partner) **Risk:** Romantic triangle conflicts, domestic violence, stalking, etc.

#### **Proactive/Reactive Actions**

- Internal/external issues
  - Crisis Management Team
  - Violence policy
  - Threat assessment advisor
  - Emergency response plan
  - Training (early threat recognition)
  - Disaster Preparation/Business Continuation
    Plans

Most institutions are exposed to all four types of perpetrators to varying degrees. These four types can threaten the safety, and have an impact on the physical or psychological well-being of employees, students, vendors, visitors or contractors on campus. They can cause damage to campus property or interrupt normal campus operations. They are responsible for the homicides as well as many of the less obvious behavioral risks that occur in America's workplaces and sometimes go unreported.

When considering issues related to workplace violence, do not forget the events that seem most random: Type I violence perpetrators. Assess vulnerability; consider proactive actions that can

make the school campus a hard target. Is there a need for structural deterrents, live or electronic security, video surveillance, etc.? Consider policy and training needs like safe conduct policies and safe cash handling procedures. Additionally, consider safety issues for female students or employees in secluded parking lots or dark, less populated areas of campus. Most perpetrators are opportunists and prey on the least prepared.

When considering actions by extremists or domestic terrorists, again proper assessment and understanding of risk are good proactive preparations. Your campus may not be considered a high-value target like a government facility or national icon, but you could be close enough to a target to be affected. Your institution might be engaged in research projects that could be targeted by domestic terrorist groups such as the Earth Liberation Front (ELF) or the Animal Liberation Front (ALF). Domestic terrorist groups often recruit from student bodies at colleges and universities to carry out their attacks. Forty percent of small businesses do not reopen after major disasters, including terrorism, man-made and natural disasters. Planning and preparation can save lives and help businesses continue and prosper in the future. These considerations also apply to colleges and universities.

When dealing with issues of violence on campus, it is important to develop a comprehensive plan, including a violence policy and procedures. The plan must be systematic and effectively and consistently communicated throughout the organization. The plan should be proactive, with a goal of preventing incidents or lessening their impact by encouraging reporting and action. The plan needs to be reactive to articulated procedures, allowing for immediate and appropriate response depending on the circumstances.

There are several effective components to consider when developing a campus violence loss control plan and process. These include a trained team, a policy, a threat assessment professional and an emergency response plan and training plan.

## Key Components of a Loss Prevention Plan and Process

<u>Crisis Management/Threat Assessment Team:</u> For all sized campuses, the Crisis Management/ Threat Assessment Team approach has proven a critical element of the school campus protection plan. The team should be composed of representatives from functional areas of the school, who work together to ensure that the school campus violence prevention plan is properly implemented and supported.

The Crisis Management Team receives incident reports, makes the initial situational assessment, involves threat assessment professionals as needed, directs the campus violence prevention

initiative, and administers, communicates and maintains the established school campus violence prevention policies, procedures and guidelines school wide. Team members should have the knowledge to coach personnel in supervisory or managerial positions who are confronted with potentially violent situations.

<u>School Violence Policy:</u> Every college and university should have a policy addressing campus violence. Without a policy, the employee or student engaged in the inappropriate behaviors associated with violence (e.g., abusing others verbally) is not breaking any rules. At a minimum, the policy should state that the institution has zero tolerance for all acts and threats of violence. Threats will not be permitted even when made in jest. All acts and threats of violence will be taken seriously, investigated and result in discipline up to and including termination or expulsion. The policy should prohibit weapons on campus property, in campus vehicles or at school-sponsored events. It is also a good idea to give examples of threats, language and gestures considered threatening.

<u>Threat Assessment Professional:</u> Retaining the assistance of a threat assessment professional can be highly beneficial to campuses of all sizes. Educational institutions gain the benefit of having a professional resource to contact on behavioral risk issues, to review incidents, provide advice and share best practices. A Professional Workplace Interaction, Inc. threat assessment professional, Dr. James N. Madero, in a presentation to the Virginia Tech Review Panel on July 18, 2007 recommended using a threat assessment specialist as part of the team, and in incident response. (Madero, 2007). Dewey G. Cornell, Ph.D. also made a recommendation for using a threat assessment approach in his presentation before the U.S. House Committee on Education and Labor hearing on "Best Practices for Making College Campuses Safe" held May 15, 2007.

The purpose of using a professional, outside resource to conduct a threat assessment is that this can reduce the institution's potential liability and increase the potential for a successful conclusion to an incident. The threat assessment professional will determine the extent to which the actions of a specific person are a threat to the well being and safety of co-workers or students, the school and the person him/herself. Professionals retained for this service should be well credentialed, experienced and qualified to give advice based on best practices. After this has been determined, a reasonable and prudent course of action should be developed, which minimizes or eliminates the possibility of injury to any involved individuals.

More and more, colleges and universities utilize Threat Assessment Retainers, so a threat assessment professional is permanently assigned to be available on a twenty four hour, seven



days a week schedule. That professional becomes familiar with the institution and is able to provide timely, best-practice advice on incidents before they escalate.

<u>Emergency Response Plan</u>: School campus violence risk reduction plans should include welldefined emergency response procedures for non-traumatic threats and acts, and traumatic events. A relationship with outside support services (police, fire, ambulance, hazardous materials, etc.) should be developed and maintained. Specific attention should be given to reporting and investigation procedures, counseling and terminating difficult employees. Other important components include procedures to avoid further trauma, trauma response, media relations and critical incident stress debriefing.

<u>Training:</u> As mentioned earlier, true behavioral excellence cannot be fully realized without properly addressing behavioral risk issues. School violence encompasses many behavioral risks, including biases, harassment and discrimination. These subjects are often interrelated, create conflict, and should be addressed through effective, motivating and informative training.

Effective training that addresses the facts, dispels the myths, identifies the risk factors and warning signs, and stresses the importance of early reporting of incidents and threats can overcome much of the resistance by persons in managerial and supervisory positions and employees and students to reporting inappropriate behaviors and threats. To remain effective, training must be given to all new-hires and students during their respective orientations. This training must be updated annually for all employees and students.

## Who Benefits from Training?

The simple answer is that everyone in a school benefits, since training promotes a safer, more secure campus.

<u>Executive Management Training:</u> Training for upper management (may include regents or trustees) should include an understanding of the inappropriate behaviors/risk factors, warning signs, the benefits of a violence policy and proper response. They should receive an overview of the plan and process, liabilities and cost to employers. One of the most important features of any school campus violence risk reduction process is for upper management buy-in. When the executive staff acknowledges the significance of a process, others in the institution are more likely to support the policies and procedures.

<u>Manager/Supervisor Training</u>: Managers and supervisors (may include department heads, etc.) are often the eyes and ears of the campus. They should be trained to recognize inappropriate



behaviors/risk factors, warning signs and to understand the importance of early reporting and intervention. In addition, because people in managerial or supervisory positions are often called upon to intervene when emotions become heated or discipline or termination is required, they should receive training in techniques and procedures for safe and appropriate responses to situations of threat.

<u>Employee/Student Training:</u> A comprehensive prevention program includes training of all employees to ensure that everyone on campus understands the scope of violence and their role in prevention. Employees and students should be trained to recognize inappropriate behaviors/risk factors and warning signs. They need to understand that it is important and necessary to report all incidents and threats of violence. If necessary, training can be done via intranet or intranet to accommodate isolated work/classroom sites or unusual schedules.

## Inappropriate Behavior and Violence

It is essential to communicate to all employees and students a clear understanding of what the early indicators of potential violence look and sound like, and what is considered inappropriate behavior on campus. Clearly defining and communicating that inappropriate behaviors are unacceptable and will not be tolerated is an important step in the risk reduction process. Then, action must be taken when inappropriate or threatening behaviors occur. Taking action will show that the behaviors are not condoned, reduce the uneasiness and fear of co-workers and fellow students and begin the intervention process.

The ability to take action depends on knowing that the problem or threat exists. Often, in the aftermath of an undeniably violent event, comments by interviewed employees or students indicate prior awareness of a problem, but failure to report it to anyone. Experts in the field of violence suggest that as many as 43 percent of those who are threatened and 24 percent of those who are attacked in the workplace don't report the incident. Reasons for not reporting include not wanting to get involved, worry about causing someone's job loss, denial and fear of becoming the perpetrator's target of retaliation. A study by Sloan, Fisher, and Cullen (1997) indicated that college students only report 35 percent of violent crimes that occur on college campuses to authorities. This means 65 percent of the violent crimes on college campuses are not reported. Students stated that in some cases they felt the crime was too minor or considered it a private matter. Other student victims indicated they were too ashamed or embarrassed to report the crimes. An additional reason given for not reporting violent crimes is fear of retaliation.

Following a homicide on campus, inappropriate behaviors associated with the incident are described in the news coverage. In the process of discovering more about an assailant, reporters



interview co-workers, friends, and fellow students and ask them to describe the perpetrator. Often, they describe inappropriate behaviors preceding the hands-on violence. In the press, as on campus, these behaviors are often misinterpreted, ignored, or denied as being potentially relevant or dangerous.

Without specific training and an understanding of violence, co-workers and fellow students sometimes write off inappropriate behaviors and statements as the perpetrator "just blowing off steam." They lack the tools or guidance to make the connection. For example, co-workers and fellow students who were around individuals who committed campus homicides stated: "I thought it was just part of his unpleasant personality to speak badly about others. I never thought he would really do anything or kill anyone;" "At lunch, he did talk about his assault rifle and the size hole it would leave in a human body. I thought the conversation wasn't suited for the cafeteria, but didn't think he would actually kill anyone;" "He would warn his supervisor and fellow employees that he had a short fuse some days and could go off very easily, so stay away on those days." When asked, "Did you tell anyone?", the answer was, "No, I didn't tell anyone; on his bad days I just avoided him."

## Predicting the Unimaginable

A common misconception about campus violence is that violence is random and unpredictable. That is a myth. The act of becoming violent to the point of physically harming someone is a process. Just as a car can't accelerate from zero to sixty instantaneously, a person does not escalate and resort to hands-on violence out of the clear blue. There are risk factors and warning signs that precede acts of hands-on violence. Once understood and reported, early intervention is possible and tragedy can be avoided.

Inappropriate behaviors linked to future hands-on violence have been identified and categorized by where they fit in the escalation process. Understanding the risk posed by these often overlooked and ignored behaviors can improve reporting of incidents and threats by employees, supervisors and managers.

In the field of violence, inappropriate behaviors are sometimes referred to as "levels," "stages" or "steps" in the escalation process. It is generally agreed that there are three identifiable groupings of risk indicators in the escalation process:

<u>Inappropriate Violent Behaviors (IVB) – Stage 1:</u> IVB-Stage 1 indicators are subtle and obscure, sometimes overlooked, most likely to be ignored, and often denied as a problem related to violence. IVB-Stage 1 indicators include:



Verbally abusive - Frequently argumentative – Makes inappropriate and sexually explicit comments – Uses profanity excessively – Expresses suicidal thoughts to others – Bullies -Noncompliance to policies and procedures - Instigates and spreads harmful lies and rumors – Displays angry outbursts and frequent signs of frustration - Frequent complaints from co-workers and fellow students

The inappropriate violent behaviors displayed at IVB-Stage 1 reveal a person who uses confrontation and challenge as coping mechanisms. The behavior is often minimized or not considered violent, when it actually is violent. This is the best and easiest time to intervene, even for co-workers or, in some instances, fellow students.

<u>Inappropriate Violent Behaviors—Stage 2:</u> IVB-Stage 2 indicators are more pronounced and there is generally an increased uneasiness among co-workers and fellow students, but the behaviors are still often ignored. Denial continues to be present. Some reporting may occur, but not as often as it should. IVB-Stage 2 indicators include:

Argues frequently and intensely – Consistently acts out anger or frustration – Engages in more extreme bullying - Openly and blatantly disobedient of organizational policies and procedures – Sets traps for others – Vandalizes - Steals from the school or from other employees or students for revenge – Makes suicidal threats – Makes verbal threats or expresses the intent to harm others – Conveys unwanted sexual attention or violent intentions by letter, voice mail, e-mail or text messaging – Stalks - Feels persecuted by others – Blames others for all problems or difficulties

IVB-Stage 2 is considered to be the "bridge" stage, meaning that individuals displaying these behaviors can be very close to hand-on violence.

Extreme Violent Behaviors (EVB)-Stage 3: EVB-Stage 3 is the most severe form of actual handson violence and cannot be denied. EVB-Stage 3 indicators include:

Commits simple assaults or physical confrontations and altercations – Commits aggravated assaults using weapons – Displays weapons, guns, knives or pepper spray, etc. – Commits armed or strong-armed robbery – Attempts or commits suicide, homicide, rape or mayhem The individual who displays EVB-Stage 3 violence is very dangerous. These behaviors have clear intent to hurt. There is great potential for psychological harm, even if physical harm is narrowly avoided. Intervention is generally not appropriate for supervisors, managers, co-



workers or fellow students. It requires the assistance of law enforcement or mental health professionals.

Colleges, universities, their employees and students should be familiar with the following warning signs, which are highly correlated to campus violence:

- Fascination with weapons
- Substance abuse
- Severe stress
- Violent history
- Hostile behavior
- Romantically obsessed behavior
- Bizarre behavior or severe changes in psychological functioning
- Decreased or inconsistent productivity
- Social isolation and poor peer relationships
- Poor personal hygiene
- Signs of depression or other mental illness
- Emotionally erratic behavior with drastic changes in personality

How many warning signs can signal a problem? Only one! These behaviors are not one-time occurrences. They are usually part of a pattern and suggestive of an overall style of inappropriate violent behavior. Once employees and students better understand the potential implications of these behaviors followed by earlier reporting, the pattern becomes more apparent.

## **Proactive Planning**

When dealing with campus violence, be proactive and create a plan that is systematically, effectively and consistently communicated throughout the campus. Proper planning and implementation can prevent violent incidents or lessen their impact by encouraging early reporting and action. Include articulated procedures that will allow for immediate and appropriate response depending on the circumstances.

Remember, that when violence is a concern and action must be taken, it is important to consider the safety and security of the entire campus population. It is always better to consult with knowledgeable individuals, either internally or externally and, whenever possible, not make decisions or take actions in a vacuum or unilaterally. Finally, remember that campus violence prevention is the responsibility of every employee and student.



David A. Smith, CEO, and Roberta S. Flynn, Psy.D. Director are with Professional Workplace Interaction, Inc., in San Diego, California. They have worked to achieve campus security for over 25 years. These professionals have nearly four decades of experience with violence and employment related issues. PWI, Inc. services include live and web-based training, threat assessment, personal coaching, expert witness services and customized services in the areas of "Behavioral Risk Management" and "Behavioral Excellence".

PWI professionals conduct training and provide consultation for all levels of a company, from entry-level employees to CEOs. PWI offers all services to educational institutions from preschool through colleges and universities. In addition to violence prevention, PWI addresses harassment, diversity, disaster preparedness, effective management and leadership. For more information, visit <u>www.pwiusa.com</u>, e-mail: information@pwiusa.com or call 858- 442-8337 or 619- 980-9244.

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