A Tiered Approach to Promote Safety and Security in an Inclusive Postsecondary Education Program for College Students with Intellectual Disability

David L. Westling
Western Carolina University

Kelly R. Kelley
Western Carolina University

Seb M. Prohn
Virginia Commonwealth University

We describe three tiers of support employed on a college campus to promote safety and security for fully included students with intellectual disability (ID) participating in a postsecondary education (PSE) program. The tiers include strategies directed toward all college students to insure safety and security, strategies proactively directed to students with ID as preventive measures, and strategies used with specific students with ID who are actually experiencing, or are perceived to be experiencing, a high degree of risk; or students with ID who are engaging in behavior that places others at risk. Four case examples are provided to show how the tiered approach was used to prevent or mitigate against the occurrence of risks to safety or security.

In the last 20 years there has been a steady increase of post-secondary education (PSE) programs for students with intellectual disability (ID). Currently, Think College (2016) reports 250 college programs for students with ID distributed throughout the U.S. and Canada. The development of inclusive PSE options for college-age persons with ID presents new opportunities for these individuals. In the college environment, students with ID may experience self-determined activities, personal decision-making, and new levels of independence in addition to developing new knowledge and skill sets. The University Participant (UP) Program at Western Carolina University (WCU) is an example of such a program (up.wcu.edu). This program started as a pilot project in 2007 among the special education faculty within the College of Education and Allied Professions and has evolved into a university-wide initiative with numerous devoted stakeholders. Over a 2-year period, students in this program engage in many college and college-related activities, and while natural supports (undergraduate students) are often present during these activities (Kelley & Westling, 2013), at other times UP students may operate independently, that is, without the presence of a support person. Natural support needs increase and/or fade based on individualized student needs in less familiar or more challenging college experiences. Typical settings and related activities in which UP students may operate, either with support or independently, include:

- Living in a dorm room in a university residence hall
- Preparing snacks and meals in common areas of residence halls
- Traveling on campus either on foot or using campus-wide transportation
- Traveling off-campus in a private automobile or using public transportation
- Eating meals in campus dining halls and in on-campus or off-campus restaurants
• Attending classes located in different campus classroom buildings
• Working in a part-time job or in an unpaid internship on or off-campus
• Engaging in various on-campus and off-campus social activities
• Belonging to various clubs or organizations and taking part in their activities
• Communicating by phone, text, or social media to various persons

As the students with ID exhibit more and more success in these activities, it becomes possible for them to operate in more of them without the presence of support persons. In fact, we have shown that over a year, supports for students may decrease by as much as 15 hours per week when a systematic process is used to reduce support hours (Prohn, Kelley, & Westling, 2015).

Safety and Security Issues on College Campuses
Whether students with ID are operating independently, or are accompanied by peers without disabilities as support persons, it is possible that risks to safety and security may occur for them, or for others who interact with them. Of course such risks are present to some degree for all college students. Typical college students are at an age when risky behavior increases and when they are exposed to various situations that lend themselves to breaches of safety and security for themselves and others (College Parents of America, 2015). But for students with ID, the risks and the consequences of those risks may be greater. Some will not have developed good decision-making skills, some will over rely on the judgment of others, and some will not have experienced novel environments without supervision. To the extent that these factors increase risks, the presence of students with ID on a college campus may be considered a liability issue to college and university administrators and higher education policymakers (Plotner & Marshall, 2015). This concern may be heightened when students are fully included and experience more freedom on campus.

The purpose of this paper is to address how the UP Program staff has attempted to promote safety and security and to reduce risks to UP students, and risks to other students that might be attributed to UP students. We believe that the strategies we use could be incorporated into many inclusive on-campus PSE programs and might allay many of the safety and security concerns raised by administrators and others. The paper concludes with four examples of how our efforts have prevented the occurrence of potentially dangerous or disturbing situations, or have lessened their impact.

A Three Tier Model for Promoting Safety and Security
For our purpose, a “risk to safety and security” related to students with ID would be a risk that could potentially cause physical or psychological harm to a student with ID, or cause such harm to another student because of the actions of a student with ID. Risks that are commonly recognized for students without disabilities would certainly be of concern for students with ID. These could include the presence of weapons, excessive drinking, drug abuse, physical violence, sexual abuse or exploitation, and sexually transmitted diseases. Additionally, other behaviors or activities that may not be as serious to most students might be of concern if exhibited by students with ID. These could include leaving an area without someone having knowledge of the departure or not being in a place where expected to be, engaging in late night binge eating, “borrowing” someone’s
belongings without asking them, or various other activities that could result from poor judgment. If such behaviors are exhibited by students without disabilities, they may be thought of as inconsiderate. However, if a student with ID engages in such behavior, they might be considered as a potential danger to the student or others.

Similar to Multi-Tiered Systems of Support (MTSS) used in K-12 schools (Shapiro, 2016), we have viewed the students with ID within the UP Program as being buffered by three tiers of support that increase safety and security and mitigate against danger for themselves and others. Tier 1 offers universal preventions and interventions that affect all students on campus. Tier 2 is proactive interventions directed specifically at students with ID. Tier 3 interventions are specifically developed for individual UP students who have exhibited risky behaviors that have affected, or potentially could affect, their own or another’s safety or security. The three tiers are discussed below.

**Tier 1: Prevention and Intervention Strategies Directed Toward All Students**

The 1990 Clery Act (20 U.S.C. § 1092(f)) required most colleges and universities in the United States to keep their campuses safe, and annually report crimes and other incidents that have affected the safety of their campuses to the U.S. Department of Education. Some of the other actions required under the law include having emergency notification and evacuation procedures, issuing timely warnings about crimes, and having missing student notification procedures (U.S. Department of Education, 2011). The implication is that most campuses make

*Figure 1. A three tiered model promoting safety and security on a college campus for individuals with intellectual disability*
efforts intended to keep all students safe.

In order to maintain this safety, colleges and universities typically include in their operations a number of departments with specific policies and responsibilities to promote safety and security. For example, on the WCU campus these departments and their responsibilities include:

- **Department of Student Community Ethics:** Educates students about their rights and responsibilities as stated in the *WCU Community Creed and Code of Student Conduct*.
- **Residential Living Department:** Enforces *Community Living Standards and Residential Living Conduct*.
- **University Police Department:** Employs state-certified police officers to provide security and enforce laws for all persons on campus.
- **University Health Services:** Meets the healthcare needs of the academic community and enhances the physical, psychological, environmental, and health education needs of the campus.
- **Department of Safety and Risk Management:** Provides support for university activities and assures a safe and healthful environment for employees, students, and visitors.
- **Emergency Services Department:** Responsible for developing and implementing institution-wide programs and projects that promote safety for all hazards and emergencies that affect the campus.
- **Campus Security Authority (CSA):** Persons designated by the university to notify the university Police Department of alleged Clery Crimes reported to them. (CSAs need not be employees of the University but may include students and other volunteers).
- **University Office of Disability Services:** Ensures equal access for students with disabilities.

In accordance with the intention of full-inclusion, UP students on the WCU campus have the same status as all other students. When admitted, they follow the same guidelines as other college students (e.g., issued student identification cards, register for courses which they audit, reside in the same residence halls as other students). Further, to do these things UP students also must pay the same tuition and fees as all other WCU students. As such, they have the same rights as all other students including the right to safety and security and being eligible for services by the above listed departments, just as are all other students.

To the extent that a college or university offers a safe environment for all its students, it should offer the same degree of safety for students with ID and therefore can be considered the first tier in a series of protections against risks for students with ID. The *Campus Safety and Security Data Analysis Cutting Tool* is an on-line tool that allows anyone to assess the safety of any college or university affected by the Clery Act (1990). This on-line tool allows any potential applicant to any college or university to access a database that will report on recent Clery crimes for specific institutions. Similar information about campus safety is available at Niche.com (2005).

In addition to the formal support systems on a campus, safety and security can also be increased by the social ambience of a college environment related specifically to overall attitudes on-campus about PSE programs for students with ID. Various
studies have shown that in general, faculty and students without disabilities are supportive of students with ID who are enrolled in PSE programs, and their support increases as they become more familiar with these students (Griffin, Summer, McMillan, Day, & Hodapp, 2012; May, 2012; Westling, Kelley, Cain, & Prohn, 2013). As a community then, it might be expected that many college campuses are somewhat safer for persons with ID than are other communities.

Tier 2: Prevention and intervention strategies directed toward all students with ID.

In the UP Program, Tier 2 interventions add an additional layer of safety and security specifically for students with ID. Students are exposed to various counseling and instructional activities intended to bolster, enhance, and complement Tier 1 provisions. These are viewed as proactive steps that are intended to present information and guidance to students at a level they can comprehend and apply in their day to day lives on campus. Tier 2 interventions are not presented as special rules or restrictions for students in the UP program. In fact, we scrupulously avoid placing any limits on our students that are not applicable to the entire student body. We do, however, want to make sure they have the necessary supports to avoid possible painful or unforgiving consequences that could occur because of poor decisions. The Tier 2 interventions that are used in the UP program include the following:

- Discussion of campus safety and related policies by a University Police officer at beginning of the student’s time in the UP program.
- Review and discussion of a modified version of the WCU Community Creed and Code of Student Conduct prior to beginning the program and periodically while in the program.
- Monthly person-centered planning (PCP) meetings to discuss progress on goals, effective learning practices, areas needing improvement, support needs, and next steps.
- Required ownership and skillful use of a cell phone with an understanding that the phone must be answered when a UP staff person is calling, and with the UP emergency cell phone number available for quick dialing as necessary.
- Use of natural supports (student volunteers) as necessary to assist UP students in traversing the campus, going to classes, and attending social events.
- Placement of natural supports in neighboring rooms in residence halls who can be aware of the UP student’s presence at night and to provide any necessary support.
- Providing courses and training in key areas such as sexuality issues and self-defense. This kind of activity, while considered important and offered to all UP students, is attended voluntarily and students may opt out.
- Using a systematic approach to reduce support time provided by volunteer students based on demonstration of safety-related skills by UP students (e.g., before allowing support-free, independent travel and other activities).

The reduction of support time noted in the above list, though applied to all UP students and therefore considered a Tier 2 intervention, is an individualized process. As we have explained elsewhere (Prohn et al., 2015), the process consists of removing support persons for specific activities,
occurring at specific times, and in specific locations. There are three criteria that must be met for the reduction of specific support:

- The student must have a recent history of appropriate, competent, and safe behavior during the activity, based on the reports of student supports.
- There must be a consensus by the UP student, current support persons, the UP staff, and the student’s parents or guardians that the student can independently engage in the activity.
- And, as stated previously, the student must reliably answer his or her cell phone when called by a UP staff member.

By using these guidelines, we err on the side of caution, but also allow students to gain as much independence as possible in the campus environment when it is reasonable to assume it is relatively safe to do so.

Although not considered a Tier 2 intervention per se, our first proactive strategy to reduce risk is to review and screen out applicants with a history of criminal, troubling, or challenging behavior. Although some might argue that this could prevent some worthy students from attending the UP program (and we might agree), with a full-inclusion program on a college campus we must be cognizant of and responsive to the entire campus community. Because such characteristics would prevent students without ID from entering the university, we cannot expect differential treatment for applicants to the UP Program. The members of the campus community who form our Advisory/Admissions Committee clearly convey the need for us to lean on the side of safety with regard to this issue. For example, the Director of Residential Living would be resistant to providing a room to someone known to have history of destroying others’ property.

**Tier 3: Prevention and intervention strategies directed toward individual students in the UP Program.**

As a supplement to Tiers 1 and 2, Tier 3 strategies help to promote a safe and secure experience for individual UP students who are actually, or perceived to be, at risk. This level of intervention will not be required for all UP students, nor for any UP student all the time. Tier 3 strategies are only required for UP students who: (a) demonstrate public behavior that raises concern among one or more members of the campus community, or behavior that actually violates the student code of conduct or the law (e.g., being abusive or aggressive toward others, stealing, underage drinking); or (b) are intentionally or unintentionally perceived to be consistently in places or situations that could be dangerous to themselves or others (e.g., walking home alone along a secluded route late at night).

It should be noted that a Tier 3 intervention isn’t only necessary based on the behavior of a UP student, but may also be necessary if a student is the subject of potential danger, such as being bullied or harassed by another individual. If a UP student falls into one of the two categories above, our approach is generally to pursue a least-to-most intrusive form of Tier 3 intervention in order to address the problem. Our list of options include the following:

- Giving advice and suggestions during PCP meetings or holding personal, individual meetings with the student;
- Developing behavior intervention plans (such as self-monitoring or a behavior contract) to help the student correct his or her own actions;
- Enforcing the student code of conduct through an appropriate university channel;
- Requiring temporary withdrawal from the program; or
Requiring permanent withdrawal from the program.

Very often, talking to the student about his or her behavior or recent situations of concern, and why it is of concern, is sufficient. Occasionally, when the message to the student does not have the desired effect, we will attempt to assist the student in modifying his or her behavior by creating and presenting a behavior intervention plan. If there is still an inadequate change in the behavior we have the option of enforcing the student code of conduct including temporary or permanent withdrawal from the program and the university.

If it is not the UP student’s behavior that is of concern, but the actions of another person regularly directed toward the student, then our focus naturally shifts to assure that the UP student will not be subjected to psychological or physical harm. If, for example, a UP student was being frequently bullied or threatened by another person and this came to our attention, based on the student code of conduct, we would immediately report the person to the appropriate university authorities and request that action be taken. Taking this approach is greatly enhanced by the presence of Tier 1 and 2 strategies. In other words, we are likely to know about such a scenario (i.e., bullying) because we learn about it from a member of the campus community, or the UP student, aware of the code of conduct, reports it to us. Table 1 summarizes the three tiers described above.

Effects of the Tiered System and Lessons Learned

The UP Program began in 2007, and to date 30 students with ID have enrolled in the program. Of this number, none have experienced any known physical or psychological harm while on the WCU campus; none have been subjected to any punishments or sanctions because of violating the student code of conduct; and none have been detained or arrested by the university police or the local sheriff’s office or police department. Still, there have been several instances when Tier 3 interventions have been necessary. In each case, the effect of the intervention has been to prevent the occurrence of harm to UP students or others associated with the UP program. Four cases are described below.

“Joey” was a young man in our program who enjoyed exercising and staying fit. When he entered the program, the UP staff

Table 1

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<tr>
<th>Tiers</th>
<th>Tiered Descriptions</th>
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<tr>
<td>1: Prevention and Intervention Towards All Students</td>
<td>Student Community Ethics, Residential Services</td>
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<tr>
<td></td>
<td>Police Departments/Campus Safety, Health Services, Safety and Risk Management, Emergency Services, Campus Security Authority, Disability Services</td>
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<tr>
<td>2: Prevention and Intervention Directed Towards All Students with Intellectual Disability</td>
<td>Initial orientation and campus safety training, Review and discuss campus Code of Conduct, Conduct monthly person centered planning (PCP) meetings, Cell phone training and efficiency, Natural supports, Resident hall support, Relationship and self-defense training, Systematic approach to reduce or increase support needs</td>
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<tr>
<td>3: Prevention and Intervention Directed Toward Individual Students in the UP Program</td>
<td>Not time or student specific, Uses least-to-most intrusive interventions, Offers advice and suggestions in PCP and individual meetings, Development of behavior intervention plans for error correction, Enforcing code of conduct, Potential temporary or permanent withdrawal from the UP program, Follows appropriate university systems when someone is bullied or threatened</td>
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respected Joey’s desire to exercise and supported him in developing a physical fitness routine that included working out in the campus fitness center and running laps on the track. On his own initiative, however, Joey decided one morning before dawn to jog across campus, and did so on a route that was unfamiliar to him. While he was running in the dark, it began to rain heavily and he lost his way. Soon, however, he found shelter and used his cell phone to call the UP emergency number. A UP staff person answered the phone, learned Joey’s location, and, despite the early hour, told him that she would be there soon to pick him up. She instructed Joey to stay where he was. Not being certain of this arrangement, however, Joey elected to also call the university police.

The situation was soon remedied, but not without a great deal of concern on the part of the UP staff, the university police, Joey, and his parents. At the next opportunity, the event was discussed in Joey’s PCP meeting with a clear explanation of why Joey’s behavior was of concern: he was running alone during the dark and could have been intentionally or accidentally hurt; he called and woke up a UP staff member from a much needed sleep; he called the police and could have delayed or interrupted their service to someone in true need; and had he not called, no one would have known of his whereabouts. Subsequent to the meeting, Joey and all the attendees reaffirmed the importance of Joey being able to exercise and re-established a schedule and connection with the Running Club on campus to which Joey agreed. The agreement did not include running across campus during the predawn hours. This resolved the issue and ended the potential danger of Joey running off schedule in the dark.

“Monica” was a lovely young lady in our program whose grace and charm led to her being elected homecoming queen during her first year in the UP program. Needless to say, she was very popular among the many students who provided her with support, and easily developed many friends both within and outside of her support group. But the concern of the UP staff arose when they and some of Monica’s friends informed us that a particular male student, one who happened to be 20 years older than her, had started spending an inordinate amount of time with her and contacting her excessively to offer her private instruction in a student organization/club on campus in which they had both been actively involved as club officers. This individual always seemed to know where Monica would be and would show up unexpectedly in various situations.

Although all UP students have the same right to privacy and relationships, as does any other student on campus, there was concern among the UP staff about Monica’s safety because the man’s behavior seemed to border on stalking. This concern was shared with Monica and her parents, and a meeting was arranged with the student supports who had observed this behavior along with Monica, her parents, and a university official. We explained that we wanted all university students to be supportive of the UP students and wanted the UP students to have friends among the student body, but we frankly stated that the man’s forms of interaction with Monica were inappropriate and should cease. The university official, Monica, and Monica’s parents agreed with us and requested that the man keep his distance from her and also stop all contact with her. While Monica continued to need some reassurance for safety with UP staff and her supports, the man complied with the request and the situation was resolved.
“Shirley” was another student in our program who was also well liked by many students and by UP staff. However, things often did not go well for Shirley and this was usually described as her having a “poor attitude” toward some of the program requirements, particularly the requirement of participating in a work-related internship. Shortly after Shirley began the second year of the program, her behavior worsened and began to be considered as an infraction of the student code of conduct. Not only did she resist going to classes and participating in her work requirement, but she engaged in behavior that would have been considered unacceptable had it come from other traditional students on campus. Although not dangerous to herself or others per se, her behavior caused concern because it jeopardized the support aspect of the UP Program. In effect, Shirley was driving away her supports because she lied, was not where she was supposed to be, locked people out of her room, was rude to supports, ran away from people, cried and whined in public areas when asked to do something, and generally drew unfavorable attention toward herself.

During the first term of the second year, we attempted to resolve Shirley’s behavioral issues through discussions with her during her PCP meeting, and then by developing a behavior intervention plan which consisted of self-monitoring and the use of positive reinforcement for appropriate behavior. We found that Shirley would show short-term improvement, but would ultimately revert to previous behavior. Ultimately we came to the conclusion that the UP Program could not positively affect the outcome for Shirley, and further, that Shirley did not want to continue participating in the program. We gave serious consideration to asking Shirley to leave the program, and arranged a meeting with her and her parents to discuss our thoughts.

At the meeting, both Shirley and her parents assured us that she wanted to continue the program and asked that she be allowed to do so. After much discussion, we dismissed Shirley from the program for the first week of the second semester. We informed her and her parents that when she returned that she should do so with an intention of participating successfully in the program and working to achieve the goals of the program. We further informed them that if she did not do so, that our only remaining alternative would be to dismiss her permanently. Shirley returned and successfully completed the program with her peers.

“Nathaniel” was a student in the UP Program who did not successfully complete the program. Shortly after beginning the program and throughout his first year, Nathaniel demonstrated several behaviors that constituted violations of the code of conduct: including touching himself in the genital area in public, touching others inappropriately, and exposing himself to others; stealing candy, food and money; making inappropriate statements to others (e.g. saying shut up or cursing); and hitting or kicking others. Nathaniel’s behavior was discussed with him during numerous one-to-one conversations and during his PCP meetings. Additionally, behavior intervention plans were created to help Nathaniel improve his behavior.

Although we did not dismiss Nathaniel because of his behavior, we did ask his parents to hold him out of the program for one year to give him time to decide if the university environment was appropriate for him and conducive to his success as an adult. Nathaniel had often reported to his...
peers that he did not wish to be in the program, and we concluded that much of his behavior was a function of that wish. At the end of the year of absence from the program, Nathaniel did not return. In a later communication, Nathaniel’s mother acknowledged that perhaps she had pushed him too hard to become a student in the program.

As can be seen from the above cases, Tier 3 interventions may be necessary to assure the safety and security of students in the UP Program (e.g., Joey and Monica), as well as to prevent UP students from causing disruption to the activities of the UP Program or to the broader campus community (e.g., Shirley and Nathaniel). The importance of the former is self-evident. If any UP student makes inappropriate decisions that put them in harm’s way, or potentially do so, then their safety and well-being is in jeopardy. On the other hand, if any UP students are disruptive within a college environment, then their behavior infringes on the right to a peaceful environment by other students. While both situations are potentially harmful to individuals, both can also jeopardize the existence of a PSE program on a college campus. No college or university is going to expose itself repeatedly to potential liability. Whether it is a student with ID who is harmed, or it is harm or disruption brought on by a student with ID that adversely affects others on campus, any college or university administrator will take due note and will respond to the situation. Unfortunately, this can mean the PSE program itself may be put in jeopardy.

**Conclusion**

Because our campus is generally safe and welcomes students with ID in the UP Program (Tier 1), because we proactively plan for students with ID to participate appropriately and avoid unsafe or precarious situations (Tier 2), and because we are prepared to provide quick, individualized attention when the need arises (Tier 3), we have achieved a record to date of no significant occurrences or threats to safety or security. We do not know how the three tiers have individually affected our record per se, but we feel that holistically, they have been significant in our achieved level of safety and security.

We recognize, however, that there may be certain conditions unique to the WCU campus that make the tiered approach we use feasible, and the extent to which our approach may be generalizable to other campuses and achieve the same results is not known. WCU is a small, regional, rural university that serves a geographical area in which many students have known each other before coming to the university, including many of the students in the UP Program. The university has a relatively small student body of approximately 10,000 and most of the daily lives of students are confined to a campus of approximately 600 acres. We limit the number of students in the UP program to no more than eight at a given time, and all are known personally to the UP staff and communicate with the staff on a daily basis. A large number of traditional students (about 200 per year) volunteer for the program and either know individual UP students very well, or are at least familiar with them, because of the natural supports they provide to them on a daily basis. Importantly, all volunteers undergo initial training that includes knowledge of intellectual disability, strategies for promoting safety, self-determination, advocacy, problem solving, and specific protocols to facilitate appropriate social skills, independence, and good judgment.
Certainly not all colleges or universities share these conditions. Nevertheless, by employing a three-tiered structure to promote safety and security, regardless of the specific campus characteristics, PSE programs for students with ID will likely do as much as they can to promote safety and security while still allowing their students as much freedom as possible.

References


Correspondence concerning this article should be addressed to David L. Westling or Kelly R. Kelley, Western Carolina University, 152 Cordelia Camp Building, Cullowhee, NC 28723. E-mail: westling@email.wcu.edu or kkelley@email.wcu.edu
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