EXECUTIVE SUMMARY
SECURITY & THREAT ASSESSMENT AND RECOMMENDATION REPORTS

Highlights taken from the original commissioned reports submitted by Security Risk Management Consultants, LLC

From the office of Vice Chancellor for Facilities / College Police
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Executive Summary Introduction

The reports summarized below are taken from the final version of the survey and assessment conducted by Security Risk Management Consultants’ LLC. This summary details the consultant’s survey process, observations and findings, and recommendations for security, process management, and technology enhancements.

A. Security Assessment and Recommendations Report

- Security Risk Management Consultants, LLC commissioned in September 2013 by PCC.
- Assessment received excellent cooperation and candid opinions from every PCC administrator, staff, faculty and student interviewed.
- Assessment included a physical survey of key areas across the College, a review of security and Police operations and current security technologies.
- Assessment activities took place both during the day and night.

Methodology of Security Assessment

Safety and security programming in an academic setting is a delicate balance of responses to and preparation for potential risks. To ensure a balanced level of preparedness and effective programming requires an understanding of risks and balancing of four critical elements:

- Effective Security Technologies
- Professional Personnel & Management
- Prevention & Training Programs
- Policies, Procedures & Practices

The key to successful safety and security programming is a viable technology infrastructure, the development and implementation of an appropriate philosophy and policies, the support of College administrators, and the empowerment of professionally trained and properly equipped personnel.

College Overview

Unique and divergent characteristics of the different campuses provide some challenges to crafting an appropriate approach that will be beneficial in creating a safer environment. Nonetheless, opportunities exist which may be phased as necessary with some basic applications that could be applied immediately.
Recommendations

Security Technologies

- Identify an individual within the Police or Facilities departments whose sole responsibility is the overall management of security and communications (radio) technologies system-wide.
- Defining standards for the base technologies is critical and should take the environment and program needs into consideration.

Intrusion Detection Systems

- Define policies and processes for system PIN code management.

Security Video – CCTV Systems

- Develop an acceptable use policy in close collaboration with the College’s legal counsel and Police.
- Policy should clearly outline formalized procedures for the installation of camera equipment and the handling, viewing, retention, dissemination, and destruction of video records, as well as training, and operator codes of conduct.

Emergency Communications Phones (Call-for-assistance stations-Blue Light Phones)

- Application of these units should be standardized across each campus.
- Unit should be clearly recognizable to the College community with a blue light that activates a strobe when a call is placed.
- A standard for placement should be used and added upon based on the needs of each campus.

Electronic Access Control (EAC)

- As the system grows and matures and appropriate policies are developed, consideration should be given to expanding the system for use College-wide by faculty, staff and students.
- EAC systems can be used to manage and monitor doors to academic buildings, use time schedules to lock and unlock, initiate lockdowns and provide enhanced facility security.

Emergency Notification Systems (ENS)

- College Police should be an integral part of the planning and implementation of the ENS.
- College Police should be considered in the decision-making process and possibly be the main initiator of any emergency communications.
Police and Security Organization & Services

- Police Department should update and adopt a statement of Mission, Vision and Values to reflect the priorities of the College and the Chief of Police.
- Professional development of the Chief and Commander should be supported and encouraged.
- Department leadership should consider membership in state and national organizations for higher education safety and law enforcement such as IACLEA.
- Promote an organizational image or identity (brand) to encourage employee pride and improve morale by documenting positive traditions and the history of the organization with awards and commendations.
- Consider the structuring of a Public Safety organization model to provide the various operating units (College Police, Security Officers, Fire Safety, Health & Safety) identity and function clarification. Additionally, this model would be enhanced if the security staff (Community Service Officers), were aligned in a separate “arm” of the Public Safety structure.
- Consider relocating the Police Office to a more central and visible location with more opportunity for interaction with members of the academic community. An open and accessible office location is more inviting and solicitous of service.

College Police

- Promote the Department identity on crime prevention and safety literature as well as “give-a-way” items used to reinforce a crime prevention message.
- Encourage Police personnel to participate in presentations and talks to share their expertise. Classroom guest presentations, student and staff meetings, organizational meetings and similar opportunities should be explored.
- Increase the use of foot and bicycle patrols or other means of transportation beyond cars.
- Reinstitute programs such as RAD (Rape Aggression Defense), workplace violence training and campus watch to the extent possible with staffing levels.
- Pursue accreditation through CALEA and/or IACLEA.
- Create an additional non-sworn staff position with responsibility for Clery compliance as well as accreditation. The new position will permit better use of other clerical staff for improved data management and report quality control.
- Implement a Records Management System (RMS), for electronic police reporting and records management which increases security of information, facilities information sharing, provides for analysis of date, trends and patterns of crime and suspects as well as permits workload measurement for determining staffing needs.
- Strong consideration should be given to providing a Communications center that offers purpose built furniture to accommodate new flat panel and radio communication technologies, offering redundant workstations with a vision for managing and monitoring a possible CCTV platform and the existing intrusion detection systems.
- Maintain and preferably strengthen relationships with surrounding agencies.
Emergency Preparedness

- Senior administrative support and encouragement of the Police campus-wide emergency preparedness efforts are essential.
- Specific emphasis on practical bi-annual and annual full-scale exercises emphasizing both internal and external communications and coordination.
- Complete a thorough and detailed study of current organizational staffing by surveying other education institutions, comparing staffing levels against agency recommendations, and measuring the college’s tolerance for risk.

Community Service Officers

- Restructure the Community Service Officer program into a defined College Security unit.
- Create a supervisor position within the Security organization to promote identity and cohesiveness in operations.
- Assign CSOs to each campus promoting consistency and community awareness as well as improving the sharing and coordination of information with briefings and crime prevention programming.
- Create a more distinctive and identifiable uniform to increase visibility and awareness.
- Expand the duties and responsibilities of the CSO staff through formalized policies, resources and training which could include crime prevention programs and safety training, reporting minor criminal offenses, collecting and processing basic crime scene evidence and reporting environmental hazards.
- Transportation, such as the golf carts, should be identified as Public Safety or Security, not Police.

Annual Security Report (Clery Report)

- All administrative or staff personnel responsible for compiling required information and data should regularly ensure they are current with provisions of Clery, the Higher Education Opportunity Act, and Title IX provisions. Regular review of the Handbook for Campus Safety and Security Reporting, as well as the “Dear Colleague Letter” from the Department of Education in 2011, along with any future updates, is critical to compliance with Federal law.
- It is beneficial to organize a “compliance team” to meet regularly to discuss the College’s response to the requirements. A routine review and identification of challenges and reporting challenges to ensure compliance is useful.
- Clearly identify Campus Security authorities and provide awareness training on reporting requirements at least annually.
- Consider instituting an electronic report writing system in the Police Department. At present, reports are prepared and passed “hand to hand”, delaying their review and “vetting.” This improved process would be beneficial in many regards but also regarding compliance on the Crime Log provisions of Clery.
• While electronic notice on the annual report’s availability is currently the practice, explore other means to alert the community.

• Requests for required statistics from other Law Enforcement Agencies currently takes place. Documentation of the request and any response should be maintained for possible audit. While such agencies are solicited for information it is not compulsory that they respond or provide details. We were advised, however, that such agencies that provide police services in reporting areas adjacent to the campuses of the College have historically been responsive. Nonetheless, continued documentation of this process is desirable.

**Miscellaneous Observations**

• All open computer terminals, in public spaces as well as libraries, should require a sign-on for access. While public access could be provided on limited terminals, a guest registration requiring an identification as well as possible time limits are reasonable measures to promote appropriate and timely use.

• Consider the registration of all vehicles using College parking areas. While one “sticker” for identification might be used on all campuses and no fee might be charged, posting notices of “restricted use” of space may be helpful in controlling use of parking areas. The identification of vehicles would be beneficial for patrolling officers. Small areas for “public parking” for limited hours would necessarily be required.
**B. Threat Assessment and Recommendations Report**

- On-site assessment completed the week of December 10, 2013.
- Examined PCC’s methodology for handling incidents involving questionable student behavior and potential threats and their impact on the safety of the environment.
- Commissioned as a result of an incident involving the behavior of a student during the Spring Semester of 2013 and the management of that event by the College.
- Identify strengths and weaknesses in the behavioral and threat processes and College approach.

**Methodology of Threat Assessment**

This assessment was a collaborative, interactive process requiring the participation of key stakeholders and other constituents. The Consultant examined relevant policy documents, memoranda regarding the individual student, the incident report, and incident history. In addition, the Consultant interviewed Behavioral Assessment Committee members and select faculty, staff and administrators. Faculty, staff, and student focus groups were also facilitated to discern their respective concerns for behavioral issues and campus safety.

**Assessment Scope**

The scope of this effort included an assessment of the response to an incident in which there was a concern for inappropriate or potentially threatening behavior by a student in the classroom as well as in conversation with another student outside of class. The Consultant examined Pima’s process for response to this and other such events, the intervention structures in place, the threat assessment capabilities in place, and Pima’s communications process during such events.

Information examined included:

- Pima’s printed resources available for addressing behavioral and threat issues.
- Policies and procedures that guide the Behavioral Assessment Committee, faculty, staff, and campus police in responding to incidents.
- The methodology utilized in addressing behavioral issues and threats.
- The performance of the process and its effectiveness in achieving a desirable outcome.
- Training and awareness of faculty, staff, students and police in understanding individual and team responsibilities in maintaining a safe school environment.
College Background

Following an earlier incident with student Jared Lee Loughner, who was removed from the campus for behavioral issues prior to his 2011 shooting rampage near Tucson, the College enacted a number of measures to address student behavioral issues including:

- The hiring of a professional psychologist as a key administrator.
- The establishment of a Behavioral Assessment Committee (BAC) chaired by the psychologist and including key staff members from Human Resources, Student Affairs, and Public Safety.
- The creation of a process to bring complaints about students to the BAC to be evaluated and monitored during regular meetings to assess status and progress.
- The publication of a guide for faculty and staff entitled, “Behavior on Scene Command Responsibilities”.
- The publication of a faculty guide for meeting with students in distress.

These are all positive measures and consistent with the goal all institutions of higher learning are striving to achieve of having the ability to manage student behavior and mitigate threats and violence.

During the Spring Semester of 2013, a female student reported a troubling conversation with a male student. On March 5, 2013, she made a report to a faculty member regarding the male student’s vocabulary, which was described in the incident report as “creeping out the complainant”. This followed an earlier event involving the same male student at the beginning of the semester when the same faculty member had asked all students to put their name on a name card. Instead of his own name on the card, the student wrote “Heinrich Himmler” on the card. The faculty member indicated that the same student also made disturbing comments in class about how he “enjoyed watching people bleed” and “babies should die”. The reported information seemed to suggest that it occurred at the beginning of the semester in January 2013, but was not reported until the March 5, 2013 incident report initiated by the female student. Subsequently, the offending student was removed from the class where these incidents occurred but was allowed to remain in another class, where that instructor had reported no problems with him. During the Fall Semester of 2013, the offending student returned to school and attended classes without incident.

Observations

While the actions taken by the College are positive, the process does not appear to have evolved for a variety of reasons, including, but not necessarily limited to:

- A lack of effective communication between administration and faculty at some campuses.
- There is no specific written policy by which the Behavioral Assessment Committee functions.
- A long history of mistrust by the faculty which predates this administration has an impact on communications.
- The methodology in place at PCC is process rather than results oriented. It does not address the core issue of whether threatening behavior should be allowed.
• Frustration over the lack of communications with and feedback from the Behavioral Assessment Committee.

Findings

This is an opportunity to streamline the methodology, maintaining appropriate FERPA and HIPPA confidentiality, while closing the gaps in the process. At the most basic level, Pima Community College has a responsibility to provide a safe environment for its students, faculty and staff. The College has a responsibility to put sound measures in place to address campus safety and behavioral issues for the six campuses and the Learning Centers. Now that the program has been in place for a couple of years and its weaknesses identified, it is time to refine the methodology to be results oriented.

It is clear that the College cannot do this without:
• The involvement of all stakeholders, including faculty, staff, students, and administrators.
• The behavioral/threat assessment process must develop and manage an “all hands” participation to be viable and successful in recognizing student behavioral issues, addressing potential threats and in facilitating expedient positive outcomes.
• Write policy to address the BAC process, define the reporting process for faculty and staff.
• Define the response process by administrators and the BAC, as well as the engagement of all students in a contract with the College.

Recommendations

Generally, the documentation provided and the practices indicated to the Consultant do not appear to address the core issue of whether threatening behavior should be allowed. It is not addressed in the faculty guide and it was not addressed in the process followed by faculty and staff when the Spring semester event occurred.

The Consultant offers the following suggested modifications to the Pima methodology:

ADMINISTRATION
• Unclear why the Behavioral Assessment Committee, established to identify and manage inappropriate student behavior, resides in Human Resources.
• This Committee belongs in Student Development where the stakeholders are more attuned to student issues rather than employee issues.
• Program could be chaired by any number of people including a psychologist, dean or VP of Student Development. Many institutions chair similar committees with the Campus Police Chief, Security Director or the College’s Risk Manager.
• Human Resources Policy Manual indicates a need for updating. The document is exceptionally large, and there are a number of confusing policies and addendums that make the document burdensome and hard to follow.
The Consultant did not specifically examine the College’s workplace violence prevention program but expect that there could be some synergy between it and the Student Code of Conduct on issues of safe workplace and zero tolerance for threatening behavior once both are rewritten.

**BAC Written Guidelines**
- BAC in existence for over two years, yet there are no written policies.
- Operating policy is essential and would provide guidance for the committee and sub-committees, and enable real accountability.
- Should be a succinct one or two-page document.

**Faculty**
- Currently there is no faculty representation on the BAC. Faculty and student counselors should be active participants.
- Brochure titled “Faculty Meeting with Students in Distress” does not offer guidance on handling troubled students who are unwilling to seek help and it does not address the desired outcome as a result of a threat or disruption.
- Faculty (both full-time and adjunct) should receive documented, mandatory training as an orientation as well as in-service training on classroom management, recognizing at-risk students and inappropriate behavior, responding to threats both overt and indirect, and the appropriate procedures on how to manage and report all of the above.

**Students**
- Mandatory student orientation should include a discussion about security awareness in a college campus environment and a review of the security aspects of the Student Code of Conduct.
- Every student, whether full-time or part-time, should be required to sign an agreement to engage in safe conduct, help create a safe and non-threatening environment, and report behavior that is threatening, disruptive or otherwise detrimental to a safe college learning environment. For those who are minors, that contract should be signed by parents or guardians. (This should be articulated along with the Student Code of Conduct).
- Student Code of Conduct should be reviewed, revised and shortened to a length that students are more likely to examine.

**College**
- Lack of information and follow up from the Behavioral Assessment Committee as well as a lack of communication from campus administrators.
- Administrators might wish to meet with campus faculty and staff on their turf as a matter of extending goodwill in the problem-solving process this effort is intending to address.
- The College needs to review the process for communicating information to the public. Faculty and staff need a process implemented where their voice could be heard without going to the media directly. All information communicated to the public either through the media or other mediums should be coordinated through the College’s Public Information Office.
- Include police officers in faculty training for the implicit threats of student behavior.
Executive Summary Conclusion

As many institutions have learned, it is impossible to prevent all threats from occurring in a dynamic environment with a diverse population such as that of a community college campus. The recommendations above are offered by the consultant as a strategy for quickly identifying behavioral and threat issues, eliciting the participation of all who work, teach, and attend classes at Pima in the process of recognizing and measuring those threats, and diminishing the College’s vulnerabilities to those threats.

Pima Community College has been earnestly working to improve security features throughout all of the campuses and locations. The College will be reviewing and analyzing the strategies and recommendations made by the consultant and will coordinate efforts to implement those elements that best serve the community, our students and the faculty and staff of the College. PCC remains strongly committed to the safety and security of our College community.

Certain sections of the reports that would compromise security or safety have been redacted by the College.