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INTRODUCTION

Security Risk Management Consultants, LLC (SRMC) has completed an examination of Pima Community College’s methodology for handling incidents involving questionable student behavior and potential threats and their impact on the safety of the environment. The assessment was 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. The purpose of this assessment was to identify strengths and weaknesses in the behavioral and threat assessment processes and to improve the approach.
METHODOLOGY

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 Team 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.
PROJECT 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 Team, 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.
EXECUTIVE SUMMARY

The on-site assessment was completed the week of December 10, 2013 by James H. Clark, CPP. The Consultant received excellent cooperation from all parties involved during a series of interviews, group meetings, and staff and student focus groups. The Consultant was able to cull first-hand reporting of the incident, as well as gain an understanding of the culture and concerns of those who work, teach, and attend classes in the Pima College community.

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.

While these steps 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 Committee functions, and a long history of mistrust by the faculty which predates this administration has an impact on communications. Finally, and most critically, the methodology in place at Pima Community College is process rather than results-
oriented. It does not address the core issue of whether threatening behavior should be allowed.

These circumstances are not unique to Pima Community College, as many other institutions struggle with these same issues. Indeed, many threat and behavioral assessment teams are still functioning without written policy.

The good news is that almost everyone interviewed, including faculty, staff, students and administrators, are interested in changing this culture and finding solutions to address these challenges. There is an opportunity to develop an effective model for handling behavioral and threat issues at the Pima Campuses. Within this report, the Consultant offers specific recommendations for affecting change. However, it will require institutional resolve to carry it out.

The Consultant was very appreciative of the level of interest, commitment and cooperation expressed during the interviews, team meetings and focus groups. Interviews were conducted with or input was received from the following:

Louis Albers, Ph.D., Campus President, West Campus
Manny Amado, Interim Chief of Police
Johnson Bia, Ph. D., Campus President Community Campus
Alison Colter-Mack, Director of Employee Relations and Policy
Charlotte A. Fugett, Ph. D., East Campus
Donna Gifford, Vice President Instruction, Northwest Campus
John Gillis, Academic Dean, Northwest Campus
Dr. Zelema Harris, Interim Executive Vice Chancellor for Institutional Effectiveness
Ana Jimenez, PCCEA President
Irene Lopez, Educational Support Faculty Counselor, Student Services Center, East Campus
Erica Martin, Educational Support Faculty Counsellor
Jerry Migler, Ph. D., Provost and Executive Vice Chancellor
Lorraine Morales, Ph. D., Vice President Instruction, East Campus
Brigid K.C. Murphy, Vice President Instruction, Downtown Campus
Michelle Nieuwenhuis, Interim Commander Police
Sheila Ortego, Interim President, Community Campus
Ann Parker, Ph. D., Vice President Student Development Desert, Vista Campus
Casilda Quinones, Director, Health & Safety
Ted A. Roush, Vice President Instruction, Desert Vista Campus
James D. Sanchez, Ph. D., Psychologist
Jeffrey Sylvan, College General Counsel
Michael Tulino, Vice President Student Development, Northwest Campus
Anne M. Vosberg, Ed. D., Vice president Student Development, Community Campus
William Ward, Vice Chancellor, Facilities Administration
Darla M. Zirbes, Ph. D., Acting President, Northwest Campus
Mark D. Ziska, Vice Chancellor, Human Resources

In addition, the Consultant met with a group of faculty members at the Northwest Campus and student, faculty and staff focus groups at West, East, Desert Vista and Downtown Campuses.
OBSERVATIONS AND FINDINGS

BACKGROUND

Following the Jared Loughner shooting and as a result of the earlier challenges he posed while a student at Pima Northwest, the College initiated several measures to address the problems associated with student behavior and potential threats. The development of a Behavioral Assessment Committee that meets regularly to review and monitor student behavior, the development of a mechanism for recognizing and reporting abhorrent or threatening behavior, the provision of training for faculty and staff, the development of faculty guidelines for “Dealing with Students in Distress”, and the development of guidelines for “Behavior On Scene Command Responsibilities” were all coupled with the existing Student Code of Conduct. These were well-intended measures and were good first steps in bringing attention to the problems and increasing awareness of the issue. These are consistent with what virtually all institutions of higher learning are attempting to achieve to curb the potential for campus 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.

As a result of this situation, the Consultant found during his interviews that the faculty has expressed frustration over the lack of communications with and feedback from the Behavioral Assessment Team and asked for more input and guidance in incidents of this nature. In November, a faculty member reported this chain of events to the news media which has brought this situation to the attention of the entire community.
This situation has been further exacerbated by a long-standing mistrust by faculty that goes back many years to the previous administration. It is also noteworthy that abnormal student behavior is a particularly sensitive issue at Pima Northwest and the College at large due to the relatively recent events involving mass murderer Jared Lee Loughner, a former Northwest Campus student who was forced to leave the College after he exhibited what were described as threatening and inappropriate behaviors during his time there as a student before he committed the murders.

**Findings**

Recent events indicate that this methodology is process but not results-oriented. 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. This will require policy to address the BAC process, define the reporting process for faculty and staff, and define the response process by administrators and the BAC, as well as the engagement of all students in a contract with the College.

The report by the instructor and follow-up by the Vice President of Student Development and the counselor triggered Pima’s process for involving the BAC and investigating the behavior of the student. The process employed by Pima was later questioned by the faculty and Faculty Senate because there was a concern by some faculty that the initial threats had not been effectively addressed in a timely manner and there had been little feedback by the BAC with regard to what was believed to be a potentially threatening situation.

There is a lack of policy to address the timeliness of reporting behavioral incidents, as well as a lack of policy that speaks to timely response. For example, the faculty member included information about a prior incident from earlier in the semester in the March 5,
2013 report. Ideally, that information should have been reported when it occurred, even if only by means of a “for information only file” incident report. The Vice President of Student Development made an attempt to validate the information with the female complainant before speaking with and sending the offending student to a counselor. It seems that there should have been sufficient information in the report and from the communication with the faculty member to act immediately on the matter. Consequently, it was nine days from the time of the report until the offending student appeared before the Vice President of Student Development and spoke with a counselor. That is not timely. It is not a criticism of the actions of the faculty member or the Vice President. It is an issue of policy. These events require clear guidelines on how and when to act on a potential threat, when to report abnormal and threatening behavior and how to act on that behavior once it has been identified.

During the interviews and faculty meetings, it was articulated by faculty members that the process followed in addressing the behavior of the male student lacked a sense of urgency and did not address the underlying threat. Further, that feedback has not been effectively communicated back to faculty and staff who have expressed fear that the behavior constituted a threat. Whether explicit or implied, the behavior was disturbing and worthy of a more robust response, as well as timely feedback to those who would have to deal with the student pending a resolution. The faculty contends and many administrators agree that communications and feedback from the Behavioral Assessment Committee on this and other student behavior matters needs to improve not just with the faculty, but with Student Affairs team members as well.

In conversations with students during the focus groups, the primary concern expressed by many was campus safety. They specifically expressed concern for dark areas of the parking lots, having to walk long distances outdoors because certain doors are locked before late night classes are let out and the absence of police or security. At West Campus, the students talked about a lack of fire drills or what to do if an active shooter event were to occur. They assume that there will be someone there in the form of campus police or security to protect them if something bad occurs, but would like some guidance on evacuation routes and safe havens within the buildings.

The faculty’s concern for the lack of urgency is valid. The process in this instance did not first address the potential underlying threat. In all instances, an administrator should be able to rely on the information on the incident report to take action. This is a policy issue and should be written with outcome in mind.

With regard to the student concerns, there should be drills to address emergency evacuations as well as shelter-in-place strategies
across all campuses. In terms of student awareness, all should be briefed by Campus Safety during the orientation process on security issues as well as student Code of Conduct issues.

It was noted during the interview process that there are many administrators, some in critical positions, who are serving in interim roles. Given the present climate of a lack of communication and certain level of uncertainty, the Administration is encouraged to expedite these roles to a permanent status.
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, in the case at hand, it was not addressed in the process followed by faculty and staff when this event occurred. The Consultant offers the following suggested modifications to the Pima methodology:

ADMINISTRATION OF THE PROGRAM

It is unclear why the Behavioral Assessment Committee (BAC), established to identify and manage inappropriate student behavior, resides in Human Resources. It is the Consultant’s view that unlike a workplace violence team that typically investigates employee behavior and works to minimize the effects of aggressive and threatening behavior among employees, this Committee belongs in Student Development where the stakeholders are more attuned to student issues rather than employee issues.

The 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.

An examination of the 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

The Behavioral Assessment Committee has been in existence for over two years, yet there are no written policies by which the Committee functions. Operating policy is essential and would provide the backbone for a more robust structure, provide guidance for the committee and sub-committees, and enable real accountability. This should be a succinct one or two-page document.


**Faculty Participation**

There is no faculty representation on the Committee. Faculty and student counselors are typically the first to be aware of student behavioral issues. It is the Consultant’s view that faculty as well as student counselors should be active participants in the behavioral assessment process as Committee members. They are the first responders, frequently have some history or relationship with their students, are well-positioned to provide real-time information, and are often in a position to make “effective” early decisions to minimize disruption and eliminate potential threats. Having representation on the Committee could bring more front-line input to the process and offer additional communications channels on a most important issue.

**Faculty Guidance**

The “Faculty Meeting with Students in Distress” brochure is written from the point of view of helping the “willing student.” It does not offer guidance on handling the troubled student who may not seek intervention, and it is not written from the point of view of creating or maintaining a safe environment. It does not address what immediate outcome is desired as a result of a threat or disruption.

**Faculty Training**

There is no mandatory faculty training on important issues such as classroom management and student behavioral issues, in recognizing and addressing at-risk students, and in clarifying what is viewed as inappropriate or threatening behavior. This is especially problematic for adjunct faculty who are frequently retained because of their subject matter expertise without necessarily considering their ability to communicate and recognize inappropriate behavior or what might be viewed as threatening behavior. This problem is not unique to Pima Community College and the utilization of adjuncts is an increasingly common practice among colleges and universities. Adjuncts come to campus, conduct their classes, spend time with some students and then leave campus. They are not necessarily a part of the campus culture, politics, or communication chain that would keep them apprised of campus security threats, student issues, and the College’s philosophy on managing threats and unacceptable behavior. There are issues of classroom management which they have not necessarily been trained or equipped to address. As relative outsiders, they may not have a sense of potential threats in this environment. The Consultant believes that all faculty, both full-time and adjunct, should receive documented,
mandatory training as an orientation process 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.

**Student Awareness**

It was clear from the student focus group that students are most concerned with attending classes in a safe environment and are not as aware as they should be on what they can do to protect themselves and what their responsibilities are for maintaining a safe campus environment. 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. This would be the time to explain the student contract (see below).

**Student Contract**

There is no proactive student participation in the process of maintaining a safe school environment. Students are expected to live by and adhere to the Student Code of Conduct, but this is a passive process and does not require active commitment. Just as any workplace has a responsibility to maintain a safe environment and employees need to take responsibility for their role in that process, so too do students who attend the College have a responsibility to participate in the safety of their environment. 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).

As a matter of routine, every student (traditional students, learning disabled, adult learners, mental health patients, veterans) should be required to sign a contract with the institution accepting responsibility for their individual role in maintaining a safe campus, for creating a non-threatening environment, and for reporting adverse behavior immediately. Such a contract would serve to create individual and group awareness to that responsibility, provide for student responsibility to avoid such behavior, and allow for an
immediate decision to remove students who violate the contract, based on overt behaviors. This will create a shared responsibility between the College and the individual student, enable a more expedient process for removing students engaging in threatening or other inappropriate behavior when a violation occurs, and empower faculty and staff to act immediately when an incident does occur. This contract should be signed by all students. Creating such a commitment document would move the College from a reactive position to a proactive position.

**STUDENT CODE OF CONDUCT**

Currently, this is a passive rather than an active “code” document. It should be reviewed, revised and shortened to a length that students are more likely to examine. This can be addressed along with the implementation of a student contract requiring adherence to the Student Code and a commitment to creating a safe and non-hostile environment.

As an example of a need for modification, the term “threatening behavior” appears in the Student Code of Conduct, but it could be made clearer to students or anyone who reads it. For example, B. 4 in the Code of Conduct talks about engaging in threatening behavior. That language should be expanded to include any threat whether explicit or implied and include specific examples of both.

**INTERNAL COMMUNICATIONS**

One of the primary complaints registered by faculty and acknowledged by many administrators was the lack of information and follow-up from the Behavioral Analysis Committee as well as a lack of communication from campus administrators. Some of this was attributed to a carryover of the distrust that existed between the prior administration and the faculty. Without getting into fault, it was noted that there are good models for communication between administrators and staff. People at several campuses do communicate with one another. At the East and Downtown Campuses in particular, it was noted that they seem to have fewer issues because people talk with one another and problems frequently are solved on the fly without a lot of process. Some of this was attributed to the leadership of the Campus President. Interestingly, she was quick to credit the faculty and staff for their willingness to participate as well. This is the model that every campus should strive for. With regard to the issue of mistrust, it seems that some fence-mending might be in
order. It is not practical to relocate the Administrative Offices to the campus sites. However, 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.

**PUBLIC INFORMATION POLICY**

The College does not have a good process for communicating information to the public. The recent incident where information was reported to the media by a faculty member is a case in point. It serves no one’s interest when information is communicated in this manner, and it is disappointing to see a faculty member reach a point where they feel they must take this step for their voice to be heard.

On the administrative side, the practice of allowing multiple players to communicate what amounts to partial information does not communicate a coherent or cohesive message to the public and frequently raises more questions than it answers. Going forward, all information communicated to the public either through the media or other mediums should be coordinated through the College’s Public Information Office. This will require strong leadership to curb what has been a somewhat loose practice.

**POLICE PRESENCE**

The campus police are the best trained group in the Pima College community to recognize and address physical threats. Perhaps they are not so well-trained to work with faculty and staff with the implicit threats of student behavior as was suggested by faculty and staff. This is a training issue and one that can be corrected by including police officers in faculty training.

The deployment challenge for police is that they begin their shift at the remote police facility some distance from all of the campuses. While it is understood that the physical plant is well-invested in communications, dispatch, and technology as part of its infrastructure, ideally police officers should spend most if not all of their time on the respective campuses. The travel time takes away from that and diminishes the police presence. More importantly, the greater presence of officers on campus enables them to have more contact with faculty, staff, and students and makes them more integral to the culture and environment. This opens up the opportunities for more community policing, which the Chief is striving for. This is a best practice on college campuses nationwide and the more regular
presence of police creates more opportunities for regular communications with all of the stakeholders on the respective campuses. The Consultant recommends that the Chief look into the potential for moving to a more centralized location or establishing that officers directly report to each campus and utilize the College network to conduct virtual shift roll-calls on-line via teleconference/telepresence or other means to communicate traditional shift change alerts and communications between supervisors and line officers.
CONCLUSION

It is fortunate that no one has been injured during the issue at hand in this incident or in the earlier dealings with Jared Loughner. 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 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.