RE-IMAGINING CAMPUS SAFETY

AT BRANDEIS UNIVERSITY

MARGOLIS HEALY AND ASSOCIATES, LLC,
IN ASSOCIATION WITH BRENDA BOND-FORTIER, PH.D.

APRIL 21, 2021

MARGOLIS HEALY
SOLUTIONS FOR SAFE CAMPUSES

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Section I

Introduction and Project Scope

Brandeis University retained Margolis Healy and Associates, LLC (Margolis Healy or MHA) and Brenda Bond-Fortier (PhD '06) to analyze current Brandeis University Department of Public Safety (also referred to as the Brandeis University Police Department (BUPD)) and other University-wide campus safety-related strategies, approaches and practices to ensure that the tenants of unbiased and respectful policing are embedded into the University's practices. We undertook this assessment within the context of campus community expectations and the national dialogue regarding police reform. Finally, as a result of this review and at the University's request, we are recommending future steps the University should consider to ensure it is responsive to demands calling on the University to re-imagine how it provides safety, security, and law enforcement services to the Brandeis community.

Organization of this Report

We present this report in a chapter format with several major parts. Section I includes the methodology for this review, including an explanation of our process for identifying major themes and cross tabulating results from multiple one-on-one, small group, and open forum sessions. Section II explores the national context regarding calls to fundamentally reform the criminal justice system, including policing. Section III contains the Executive Summary. Section IV includes the major themes related to the Re-Imagining process, along with specific observations and recommendations to achieve these goals. Finally, Section V contains the various attachments to this report.

Acknowledgements

We acknowledge the assistance and guidance of Lois Stanley, Vice President, Campus Operations and Stewart Uretsky, Executive Vice President, Finance and Administration, both who served as our primary liaisons for this project and provided invaluable guidance throughout this review. We also appreciate the participation of members of the Board of Trustees and the Search Committee for the next Chief of Public Safety, and the hundreds of Brandeis community members with whom we interfaced during the fall of 2020. Without a doubt, every Brandeis community member provided important context and historical information, their honest and thoughtful perceptions, and their suggestions for reimagining campus safety at Brandeis University. Without exception, everyone was welcoming and forthcoming in their opinions about the matters at hand.

Disclaimer and Disclosure

Margolis Healy and Associates, LLC, conducted this review and prepared this report at the request of Brandeis University. We provide our opinions, findings, conclusions, and recommendations solely for the use and benefit of Brandeis and specifically disclaim any warranties (expressed or implied). Readers should not construe the statements, opinions, and recommendations in this report as a governing policy, or decision, unless so designated by other documentation. We base this report on the most accurate data gathered and available at the time of the review and presentation. Our recommendations might be subject to change in light of changes in such data.

Methodology

The process for re-imagining campus safety at Brandeis was two-fold, including both a focused assessment of policies and practices within the Brandeis University Department of Public Safety, and broad community outreach and input through Forums and listening sessions.

Our combined team engaged in this work by becoming familiar with the University and its expectations regarding campus safety and security. During the re-imagining process, the team conducted 25 small group and one-on-one interviews from November 5 - November 18, 2020 to identify the major themes related to this review. Due to travel restrictions during the current pandemic, we conducted our interviews remotely. The team interviewed a wide range of stakeholders, including representatives from the President's Management Council, members of the Board of Trustees, Athletics, Communications, Marketing, & External Affairs, University Events, Brandeis Emergency Medical Corps (BEMCO), Human Resources, Information Technology Services, Office of Diversity, Equity, & Inclusion (DEI), Office of the General Counsel, Facilities Administration, Public Safety and BUPD members. Spiritual Life, and Student Affairs. In addition to the departmental review

phase of this assessment, we partnered with Dr. Brenda J. Bond-Fortier (PhD '06), Professor of Public Administration at Suffolk University, to facilitate conversations with a broad range of campus constituents. Dr. Bond-Fortier was assisted by Margolis Healy team members Christi Hurt, VP for Strategic Initiatives, and D.A. Graham, MHA senior associate. The team held 20 focused input sessions and open forums, attended by more than 250 participants. Participants included students, staff, University administrators and leaders along with faculty, members of the Board of Trustees and BUPD members, as well as City of Waltham leadership. Recognizing that this number does not represent the entire Brandeis community, we also opened an online web portal to collect additional community member input and feedback.

To identify the major themes for this review, we cross-referenced information from the one-on-one meetings, small group interviews, and facilitated sessions and forums with issues raised as part of our assessment of BUPD policies and practices. Where participants raised an issue three or more times, we further explored that concern to determine if it rose to the level of a major theme. Most often, if participants raised an issue three or more times, it aligned with an observation that the team had independently identified. Because we assessed Brandeis' current state of campus security and policing practices against reasonable and contemporary practices in campus safety and security, the gap analysis is an organic outcome of our review. For example, when interviewees expressed a desire for more robust collaboration between BUPD and internal stakeholders, either in an open forum or during the key partner interviews, *and* it was repeated three or more times, we noted it as an area requiring additional exploration. We then conducted additional research to understand the Department's strategy for coordinating with key partners and reached consensus regarding the criticality of the challenge. Because we received feedback from multiple constituent groups, we were able to triangulate the Major Themes and Specific Observations to a high degree of certainty.

We base our recommendations on best and evolving promising practices in higher education safety and security and draw from our experience, our work from other similarly situated institutions, and our ongoing exploration of the evolving campus security and policing landscape.

Section II

The Context and National Dialogue on Eliminating Systemic Racism in Policing

Protests in response to the continued killing of unarmed black people, including the brutal murder of Mr. George Floyd, which many people experienced repeatedly as the video footage played hourly on national television and social media, and the weight of public opinion in recent months, pose fundamentally important concerns about the fairness and equity of police practices and services. Widespread concerns about these issues are not new, and have swelled periodically in the past half century in the form of protests against police practices since the late 1960s and early 1970s, during an era of intense policing of urban eras and in many localities. Since then, particularly in the early 1990s after the beating of Rodney King,[1] these protests have grown, drawing additional scrutiny to police practices, especially with regard to policing in traditionally disenfranchised communities. Behind these episodic protests, however, lies ongoing frustration about police practices and behavior and, ultimately, the role of police in society.[2] This frustration has been particularly salient in communities of color.

Although protest of police practices is not new, the intensity and breadth of the recent uprisings reveal that American policing is facing a crisis of legitimacy. Since the shooting of Michael Brown in Ferguson, Missouri in 2014, "incidents involving police use of lethal force have been at the center of a reshaped landscape in which law enforcement now operates in this country."[3] Police are currently under more intense pressure to change than at any time in half a century. Campaign Zero, the Movement for Black Lives, and thousands of protests have demanded change in policing.[4] Increasingly, public opinion favors change.[5] Demands ranging from reform of particular police practices to abolition of the police have gained a

[1] National Advisory Commission on Civil Disorders (Kerner Commission), *Report of the National Advisory Commission on Civil Disorders* (Washington, DC: Government Printing Office, 1968); Bruce D. Porter and Marvin Dunn, *The Miami Riot of 1980: Crossing the Bounds* (Lexington, MA: Lexington Books, 1984); U.S. Commission on Civil Rights, *Who Is Guarding the Guardians? A Report on Police Practices* (Washington, DC: U.S. Commission on Civil Rights, 1981); Gerald David Jaynes, et. al, eds., *A Common Destiny: Blacks and American Society* (Washington, D.C.: National Academy Press, 1990); Christopher Commission, *Report of the Independent Commission on the Los Angeles Police Department* (Los Angeles: City of Los Angeles, 1991).

[2] See, e.g., Ronald Weitzer and Steven A. Tuch, *Race and Policing in America: Conflict and Reform* (New York: Cambridge University Press, 2000); Rod K. Brunson, "'Police Don't Like Black People': African American Young Men's Accumulated Police Experiences." *Criminology & Public Policy* 6 (2007): 71-102; Rod K. Brunson and Jody Miller, "Young Black Men and Urban Policing in the United States," *British Journal of Criminology* 46, no. 4 (2006): 613-40; Gregg Van Ryzin, D. Muzzio, and S. Immerwahr, "Explaining the Race Gap in Satisfaction with Urban Services," *Urban Affairs Review.* 2004;39(5) (2004):613-632.

[3] Laurie Robinson, "Five Years after Ferguson: Reflecting on Police Reform and What's Ahead," ANNALS, *AAPSS*, 687 (Jan. 2020): 228-39, at 228

prominent place on the public agenda of many communities, including at Brandeis University and in the greater New England area.

Pressures for change are based on reasonable concerns about patterns of practice in municipal policing. Some of the most prominent and widespread activities of city police departments, specifically investigatory police stops and proactive enforcement against minor violations, disproportionately affect Black, Latinx, and Indigenous peoples.[6] African-Americans generally evaluate the quality of other police activities, like police responses to calls for service, more negatively than do whites.[7] These broad characterizations are well documented by decades of careful research. Crucial questions for our review include: To what extent do the activities of the BUPD follow and/or mirror troublesome practices in the broader law enforcement community? How may these activities be changed to bring them into better alignment with the principles of bias-free and transparent policing. The authors of the Brandeis "Black Action Plan ,[8]" assert that Brandies has an obligation to reform its police department and have outlined several reforms in response to the national, local and campus movement to bring about racial justice. This report considers the demands specifically related to BUPD outlined in the Black Action Plan.

The recent protests and other calls for change in policing reflect the tensions identified above. Foremost, as the police are a part of the society, they reflect and may concentrate the racial and other biases of that society. Abundant research shows, beyond a shadow of a doubt, that many Americans *and* American institutions, embody racial biases. Even if intentional racism has faded— and it clearly remains a powerful force in American society—deep racial inequalities in wealth that are the direct product of intentionally racist policies of the past continue to shape people's present conditions in ways that expose different groups to divergent patterns of policing.[9] Put simply, the problems in policing are also the problems of American society, and of American governing institutions and the economy.

University police reflect these broader societal tensions. Universities in the United States have employed police officers since Yale University's first officer in the 1890s. As the institution of research universities developed in early 20th century, many employed security officers for their growing campuses. In the early decades of the past century, some of these officers appear to have served mainly to protect the security of university buildings. As campuses expanded and incorporated public roadways, the function of campus security officers expanded to address traffic safety. As universities grew dramatically in the wake of World War II, a scholar writing in 1958 observed that their police departments likewise grew and "the scope of activities have changed from a primary emphasis for providing watch services to providing a wide range of services in traffic regulation, investigation and other areas of normal police service."[10]

Universities responded to the unrest of the 1960s by expanding and professionalizing their police forces, in part to ensure university autonomy from

[4] https://www.joincampaignzero.org/solutions; https://m4bl.org/policy-platforms/end-the-war-on-black-communities/; Vanessa Williamson, Kris-Stella Trump and Katherine Levine Einstein, "Black Lives Matter: Evidence that Police-Caused Deaths Predict Protest Activity," *Perspectives on Politics*, 16(2) (2018): 400-415.

[5] Aimee Ortiz, "Confidence in Police Is at Record Low, Gallup Survey Finds," *New York Times*, Aug. 12, 2020. https://www.nytimes.com/2020/08/12/us/gallup-poll-police.html; Nate Cohn and Kevin Quealy, "How Public Opinion Has Moved on Black Lives Matter," *New York Times*, June 10, 2020. https://www.nytimes.com/interactive/2020/06/10/upshot/Black-lives-matter-attitudes.html; Giovanni Russonello, "Why Most Americans Support the Protests," *New York Times*, June 5, 2020. https://www.nytimes.com/2020/06/05/us/politics/polling-george-floyd-protests-racism.html;

[6] See, e.g., Bernard E. Harcourt, *Illusion of Order: The False Promise of Broken Windows Policing* (Cambridge, MA: Harvard University Press, 2005); Dorothy E. Roberts, "Race, Vagueness, and the Social Meaning of Order-Maintenance Policing," *Journal of Criminal Law & Criminology* 89(3) (1999): 775-836; Charles R. Epp, Steven Maynard-Moody, and Donald Haider-Markel, *Pulled Over: How Police Stops Define Race and Citizenship* (Chicago: University of Chicago Press, 2014); Michelle Alexander, *The New Jim Crow: Mass Incarceration in the Age of Colorblindness* (New York: New Press, 2010).

[7] Ronald Weitzer and Steven A. Tuch, *Race and Policing in America: Conflict and Reform* (New York: Cambridge University Press, 2000); Gregg Van Ryzin, D. Muzzio, and S. Immerwahr, "Explaining the Race Gap in Satisfaction with Urban Services." *Urban Affairs Review.* 2004;39(5) (2004):613-632 (showing that the racial disparity in public evaluations of police services is substantially wider than evaluations of other urban services).

[8] Please see https://docs.google.com/document/d/1mEaLYjYb2tZRz3hoDR5TOw_KhS41oKLtUz5uPIajEMk/edit for the complete Black Action Plan outline.

[9] See, e.g., Richard Rothstein, *The Color of Law: A Forgotten History of How Our Government Segregated America* (New York: Liveright, 2017); Ira Katznelson, *When Affirmative Action was White: An Untold History of Racial Inequality in Twentieth-Century America* (New York: W.W. Norton, 2005); Michael Tonry, *Punishing Race* (New York: Oxford University Press, 2011).

[10] Robert F. Etheridge, "A Study of Campus Protective and Enforcement Agencies at Selected Universities" (unpublished Ph.D. dissertation, Michigan University, East Lansing, Michigan, 1958), p. 87.

external police intervention and in part to maintain order on campuses.[11] President Nixon's Commission on Campus Unrest called on universities to expand their police forces to better control campus protests.[12] The American Bar Association, in a major report examining the law enforcement response to campus protests, emphasized that "primary reliance should be placed on university disciplinary procedures, supported by university security personnel" because resort to external law enforcement may be counterproductive, escalating tensions, and because "the university loses control over the proceedings."[13] These cross-cutting pressures contributed in the late 1960s and early 1970s to adoption by many states of statutory authorization and regulation of campus police forces.

The value of keeping "control over the proceedings," rather than surrendering it to external police forces, perhaps best characterizes the institutional conditions favoring maintenance of separate campus police forces. Nearly every significant study of campus police observes that university control over their police contributes, as one author observed, to "a more discretionary, non-punitive approach to law enforcement."[14] Although campus police tend to perform primarily a service rather than a law enforcement role, that author's study of 245 U.S. universities identified three different patterns in campus policing.[15] In one, which we might call a student services role, campus police worked closely with university student support staff to assist in addressing the various needs and problems of a young adult population. In a second, called "selective enforcement," campus police are viewed by administrators as "a necessary adjunct" to the institution, to be called on occasionally to address more serious criminal offenses and security concerns. In the third pattern, called by the author "equal enforcement of the law," campus police assume a role much like municipal police in enforcing traffic regulations and criminal codes, albeit with a less punitive posture than is typical of municipal police forces.

Although university police forces commonly differ from their municipal counterparts in their less punitive posture, as crime and the presence of guns on campus grew in the 1970s and 1980s, and as the threat of mass shootings emerged in the 2000s, university police increasingly assumed the institutional forms and imagery of regular police forces.[16] Although in recent decades crime rates overall have declined, shootings on campuses have increased. A 2016 study of the period 2001-2016 documented 190 shooting incidents on college campuses in which 437 people were shot, 167 were killed and 270 were wounded.[17] Pressures on police to respond to campus shootings and other crimes, and to the widespread presence of guns on campuses, have only intensified in recent years. Partly in response, campus police are organized much like other police forces, in a quasi-military structure, many receive the standard and specialized training of municipal officers, operate 911 emergency call systems and respond to calls for service via these systems, wear uniforms and drive patrol vehicles that appear visually similar to those of municipal police, and carry the weapons, including firearms, and in some cases patrol rifles, typical of municipal police.[18]

[11] John J. Sloan,"The Modern Campus Police: An Analysis of Their Evolution, Structure, and Function." American Journal of Police, vol. 11(2) (1992): 85-104; Roderick Ferguson, *We Demand* (Berkeley, CA: University of California Press, 2017).

[12] The President's Commission on Campus Unrest, *The Report of the President's Commission on Campus Unrest* (Washington DC: U.S. Department of Health, Education, and Welfare, 1970).

[13] *American Bar Association, Report of the American Bar Association Commission on Campus Government and Student Dissent* (Chicago: American Bar Foundation, 1970), p. 30.

[14] Seymour Gelber, *The Role of Campus Security in the College Setting* (Washington, DC: U.S. Department of Justice, National Institute of Law Enforcement and Criminal Justice, 1972), p. 9. See also D. Bordner and *D. Petersen, Campus Policing: The Nature of University Police* Work (New York: University Press of America, 1983); Aramis Watson, *The Thin Black Line: How Black Housing Staff Make Meaning of their Encounters with Campus Police,* PhD. Dissertation, University of Kansas, 2020.

[15] Gelber, *Role of Campus Security*, pp. 9-10.

[16] Sloan, "The Modern Campus Police."

[17] Ashley Cannon, "Aiming at Students: The College Gun Violence Epidemic" (New York: Citizens Crime Commission, 2016); http://www.nycrimecommission. org/pdfs/CCC-Aiming-At-Students-College-Shootings-Oct2016.pdf.

A small body of peer-reviewed research suggests that college students evaluate the police more negatively than others, and that Black students evaluate campus police more negatively than white students.[19] As many college students from historically marginalized groups increasingly have experienced some forms of "zero-tolerance policing" practiced in some police departments, or have heard of these experiences from friends and family members, their perceptions of campus police, too, are likely to be influenced by these experiences.[20,21]

In sum, institutional conditions in higher education contributed to the development of campus police forces and to a campus policing role that is less punitive and often more service-oriented than is typical of U.S. policing. However, as campus police have become so closely modeled after their municipal counterparts and adopted some of the practices of urban police, trust in campus police, like trust in police generally, appears to have declined[22], and is lower among historically marginalized student groups. The highly publicized killings in 2020 of unarmed black and brown people, including George Floyd in Minneapolis, Breonna Taylor in Louisville, and Rayshard Brooks in Atlanta, Georgia, appear to have significantly changed the landscape, bringing about significant calls ranging from complete abolition of the police, defunding the police (which, amounts to, in the most basic of terms, re-distributing funds from the police to other support services, thereby reducing overall reliance on the police), to monumental reform. The reality is that there is, generally speaking, widespread disagreement on what these various phrases mean, from both a philosophical and practical perspective.[23] Having said this, we want to be completely transparent by stating that the recommendations stemming from this review fit within the camp of "defund" – where we adhere to the principle that communities, including campus communities, have come to rely too heavily on the police to solve problems for which the police do not have the requisite expertise or staffing advantage – and reform, where we acknowledge that campus police agencies must do more to be responsive to campus expectations regarding a wide range of policies and practices. It is within this context that we report our findings related to this review.

[18]*Ibid.*; K. J. Peak, "The professionalization of campus law enforcement: Comparing campus and municipal law enforcement agencies," In B. S. Fisher & J. J. Sloan (Eds.), *Campus crime: Legal, social and policy perspectives* (Springfield, IL: Charles C. Thomas, 1995); Max L. Bromley, "Comparing Campus and Municipal Police Community Policing Practices," *Journal of Security Administration* 26(2) (2003): 37-50;

[19]Shannon K. Jacobsen, "Policing the Ivory Tower: Students' Perceptions of the Legitimacy of Campus Police Officers," *Deviant Behavior*, 36:4 (2015), 310-329; L. Susan Williams & Stacey Nofziger, "Cops and the College Crowd: Young Adults and Perceptions of Police in a College Town," *Journal of Crime and Justice*, 26(2) (2003): 125-151; J.M. Mbuba, "Attitudes toward the police: The significance of race and other factors among college students." *Journal of Ethnicity in Criminal Justice*, 8(3) (2010): 201-215.

[20]Weitzer and Tuch, *Race and Policing*; Epp, Maynard-Moody and Haider-Markel, *Pulled Over*.

[21]See for example, https://www.rand.org/pubs/tools/TL261/better-policing-toolkit/all-strategies/zero-tolerance/in-depth.html, where the authors argue that "Zero-Tolerance" policing "did not generate statistically significant crime reductions", and potentially damages police-community relations.

[22]See for example, the Chronicle of Higher Education opinion piece by Grace Watkins, dated 10/21/2020, entitled: The Crimes of the Campus Police; https://www.chronicle.com/article/the-crimes-of-campus-police

[23]The phrase "defund the police" has served as a rallying cry for those calling for significant reform in policing. Depending on the perspective, "defunding the police" initiatives can range from re-distributing funds from the police to other, more appropriate services, thereby reducing overall reliance on the police, to monumental reform. There remains widespread disagreement on what "defund" means from both a ideological and practical perspective. Having said this, we want to be completely transparent by stating that the recommendations stemming from this review fit within the camp of "defund" – where we adhere to the principle that communities, including campus communities, have come to rely too heavily on the police to solve problems for which the police do not have the requisite expertise or staffing advantage – and reform, where we acknowledge that campus police agencies must do more to be responsive to campus expectations regarding a wide range of policies and practices.

Based on our work to date, which informs our understanding of Brandeis campus members' expectations regarding campus safety and security, it is our professional opinion that Brandeis University should 1) strengthen its campus safety program by being more transparent and intentional regarding the primary role and mission for Brandeis Public Safety; 2) shift the culture within BUPD and fundamentally change its policing approach; and, 3) invest in alternatives to BUPD response in many situations.

With respect to intentionality and campus consensus on the primary role and mission of Public Safety, the University should engage in a Public Safety strategic planning process to understand and acknowledge the many complex issues involved in maintaining a reasonably safe campus and change practices, where needed. In our view, the University must be overly transparent in its efforts and ensure the processes include diverse voices and perspectives. Based on our research, we note that Public Safety does not have a clearly defined mission statement, and has not systematically engaged in a robust process to review and update its operational framework. It appears that the department has evolved organically, without input and consent of the campus leaders and the campus community. Given evolving community, including campus community, expectations regarding transparency, input, and police reform, the University should embrace more intentional oversight and engagement with the department.

During the campus forums, many participants agreed that they experience the department "As a municipal force…dropped into a campus environment, existing as a force, but not a part of the

community." Some suggested that BUPD should consist of officers who want to work on campus, appreciate the student experience (before and while at Brandeis), and embrace training about the specific characteristics of Brandeis (on an ongoing, regular basis). During our interactions with BUPD members, many expressed their aspirations to engage with the campus community in meaningful ways, sharing that these opportunities are not readily available to line-level officers and supervisors. These comments support our recommendations that the University be more intentional about building consensus about the primary role, mission, and values of the department and creating appropriate opportunities for department members to partner with various constituents in the campus community. In short, Brandeis University needs to have a clear definition and understanding of what "campus safety and well-being" means, and implement programs, both inside BUPD and in other departments at the University.

We uncovered several areas of the Public Safety operation that the University should address in the near term, including updating policies, with input by the campus community, enhancing collaboration with certain campus partners, and implementing an evidence-based approach to engaging with the campus community. Taken singularly, each of these challenges represents major obstacles to embracing transformational approaches to providing campus safety in the 21st Century. Together, they represent missed opportunities to build trust with the campus community and add value to the University experience. We explore each of these points within the Themes outlined in the full report, and summarized below.

- **Achieve Institutional Consensus on Role, Mission, and Values for Brandeis Public Safety**

  Given the University's continuing work to identify campus expectations regarding campus safety, the University should task members of the Campus Safety Committee, or a sub-committee of this group, including students, faculty, and other University officials, with reaching consensus on the meaning of "safety" for the Brandeis community. The goals for this effort should include University agreement on the BUPD role and mission and relevant mission statements for the Public Safety divisions. This alignment of mission proclamations across Public Safety would assist existing staff and the new Chief of Public Safety with understanding campus community expectations and the values that are central to serving the Brandeis community.

- **Adopt an Alternative Response Program**

  There was universal agreement during the forums and in interviews with campus constituents that the University should adopt alternatives to sworn officers[24] responding to every call for service received by the BUPD Dispatch operation. An alternative response model would ensure that the University pairs the appropriate campus (or local community) resource to the stated needs of the individual requesting services. The concept of "differential response" was a

[24] "Sworn Officer" refers to BUPD officers who are commissioned police (or sworn) in accordance with the provisions of Chapter 22c, Section 63 of the Massachusetts General Laws. Generally, this means the officers have been afforded Commonwealth (and institutional) authority to make arrests, use force, and otherwise engage in police activity.

ENGAGE WITH THE COMMUNITY

TRANSPARENCY

OVERSIGHT

ACCOUNTABILITY

ALTERNATIVE RESPONSE

major theme arising from the campus forums, with participants characterizing the current process of sending a BUPD member to all calls for service as "broken," and out of sync with the needs of current students and other campus members. Participants suggested a "community of care" model, where the University provides other, alternative resources for calls that do not signify the need for a BUPD police officer.

Based on our analysis of "call-for-service" (CFS) data, our understanding of current BUPD operations, and Black Action Plan demands for additional investments in mental health resources and re-imagining BUPD strategies, we have identified several opportunities for the University to create a coordinated alternative response program for the majority of calls for services that do not require a police officer initial response. To be clear, this initiative will incur additional costs for the University, and therein lies one of the fundamental tenets of the "defund" movement, which, in part, calls for re-directing or re-distributing resources from BUPD to other, more appropriately align resources to contribute to "safety."

- **Develop an Evidence-Based Strategy for Engaging with the Campus Community**

It was evident during the forums that, despite negative feedback we received from several forum participants regarding their perceptions of Public Safety, many nevertheless, desire an engaged campus safety department, and one that is fully transparent regarding its role and how it performs its work and is open to feedback regarding its operations. During our interviews with campus partners, many also supported the desire for a more engaged campus safety team. As previously noted, many BUPD members also indicated their desire to participate in partnership-building initiatives. We should highlight that some

forum participants noted that BUPD "shows up," during times of crisis or need, with one attendee sharing that there are a "handful of amazing officers" who should be celebrated. Interviewees participating in the department review also cited their general satisfaction with the response they receive during complicated situations. Unfortunately, forum participants also voiced a fair amount of displeasure with the ways that some BUPD officers respond to situations, noting that "they feel like they were imposing on BUPD when they request services."

The University should refer to the recommendations from the President's Task Force on 21st Century Policing as a framework for the development of a comprehensive community policing and community engagement strategy (https://cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf). Points within the Final Report that are particularly important for the University to consider include:

– Community policing should be infused throughout the culture and organizational structure of law enforcement agencies;

– Law enforcement agencies should create opportunities…for positive non-enforcement interactions with police. Agencies should also publicize the beneficial outcomes and images of positive, trust-building partnerships and initiatives; and,

– Law enforcement agencies should adopt model policies and best practices for technology-based community engagement that increases community trust and access.

- **Review and Update Appropriate Policies, Procedures, and Supporting Infrastructure**

The University should require Public Safety to undertake a comprehensive review of all its policies and procedures to ensure they meet contemporary practices and rapidly evolving standards in campus safety and policing. This is particularly relevant given ongoing calls to reform police practices to eliminate illegal and dangerous use of force techniques, the various edicts from Federal and state officials,[25] and guidance from national law enforcement associations. Our analysis of the policies related to high liability areas, such as use of force, vehicle pursuits, response to mental health crises, and internal affairs determined that the department's policies do not meet contemporary standards.

During the policy overhaul, Public Safety leadership should coordinate the development of these policies with key partners and community members, as appropriate and in line with evolving transparency and accountability approaches. The department will also need a purposeful communication strategy to educate and inform department members of new policies or changes/revisions to existing policies.

[25] See for example the recently enacted Massachusetts law (https://www.mass.gov/news/governor-bakersignspolice-reform-legislation) entitled *"An Act Relative to Justice, Equity and Accountability in Law Enforcement in the Commonwealth,"* which creates a mandatory certification process for police officers, increases accountability and transparency in law enforcement and gives police departments a greater ability to hire or promote only qualified applicants.

- **Enhance Transparency of Training Programs**

    In general, forum participants shared that they are under the impression that BUPD staff don't receive much training, and don't receive training in appropriate areas, such as implicit bias, cultural competency, and de-escalation. Our review of the BUPD training program suggests this perception is incorrect. We were impressed with the depth and breadth of the training programs the department has offered over the past several years. These training programs have included cultural competency spanning a wide range of diverse communities; trauma-informed responses and investigation; de-escalation, active violence response; and ASL orientation. While we will make recommendations for overall improvements to the training program, including strengthening record-keeping and adding other critical areas, such as procedural justice and customer service, we commend the outgoing Chief for being thoughtful about providing real-time, meaningful training to the department.

    To be clear, many of the initiatives recommended in the report will require additional investments for the University. While these investments may appear counter to calls to "defund" the police, they are necessary, in our opinion, to reimagine the University's approach to campus safety, security, and policing. Adopting an alternative response program will facilitate the University beginning the process of redirecting or redistributing resources from BUPD to other, more appropriately align resources to contribute to "safety." We address the strategy to achieve a re-imagined campus safety program in the full report.

Section IV

Major Themes

Major Theme 1.0: Achieve Institutional Consensus on Role, Mission and Values for Brandeis University Public Safety

It was clear during our interviews with campus members, including during the listening sessions, and with staff within Public Safety, that there is significant lack of clarity about the department's mission and values, and the role the University expects Public Safety to assume to contribute to a reasonably safe environment at Brandeis University. This confusion was most notable during the forums where most participants described BUPD as being "disconnected" from campus life, and, failing to "live by the same values as the greater Brandeis community." We heard during these same forums that campus members want Public Safety to collaborate with campus partners in a substantive manner in new student orientation, to serve as subject matter experts on regional, national, and global safety issues, and to be active partners in all facets of campus safety efforts.

The BUPD mission statement does not clearly articulate the primary role of the department beyond the phrase related to making the campus "safe and enjoyable." The current statement lacks the foundational elements that should describe the range of services the department offers and how it contributes to the Brandeis community. The University should engage in a Public Safety strategic planning process, perhaps led by the Campus Safety Committee,[26] to build a collaborative, consensus-based agreement on the primary role and mission of the department. This Public Safety strategic planning process should create the operational and aspirational constructs that define how BUPD should function on campus and the values that the campus expects in all BUPD operations. These constructs

[26]Brandeis University re-established the Campus Safety Committee during the Spring of 2020 to "formalize collaboration and communication among stakeholders across campus." (https://www.brandeis.edu/emergency-prepare/campus_safety_committee.html)

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should include, based on feedback we received during our interviews and listening session, fair and impartial delivery of its services, initiatives to ensure inclusion and collaboration, and strong ties to the University's educational mission.

In our opinion, the absence of a fully adopted, consensus-based mission statement contributes to Public Safety staff members' frustration and feelings of disenfranchisement, and the perception by some members of the community that they do not see BUPD as sufficiently integrated into the Brandeis community.

Given that the University has engaged in a process to identify community expectations regarding campus safety, the University should engage members of the Campus Safety Committee, or a sub-committee of this group, including students, faculty, and other University officials, in reaching consensus of what "safety" means for the Brandeis community. The goals for this effort should include reaching consensus on the BUPD role and mission and creating relevant mission statements for the Public Safety divisions, similar to what has occurred with BEMCo.[27] This alignment of mission proclamations across Public Safety would assist existing staff and the new Chief of Public Safety with understanding campus community expectations and the values that are central to serving the Brandeis community.

Public Safety does not have a strategic plan, nor does it engage in strategic planning from year-to-year. In our experience, high performing campus safety departments engage in active planning to ensure that their services continue to meet community campus needs and expectations. Strategic planning should analyze current and future conditions, setting short and long-term goals and actions plans for the development of personnel and maximization of available resources. Effective strategic planning creates a sense of ownership in department members, and creates opportunities for engagement with key stakeholders outside of Public Safety. Involving key stakeholders in strategic planning further strengthens trust in the department and alignment of mutual goals and objectives. Once developed, the University, through the Campus Safety Committee and leaders in Brandeis Public Safety, should regularly review the mission statement and approach to ensure continued alignment with evolving safety needs and the University's strategic direction. On-going monitoring and systematic review of agreed-upon metrics will necessarily be central to the work of the review committee.

Recommendations

1.1 Engage in campus-inclusive and comprehensive Public Safety strategic planning process with the goal of reaching consensus on the role, mission and values for Public Safety and a mission statement that aligns with the University's values and expectations. As part of this process, the University should clearly define its safety and security goals and objectives. We recommend the Campus Safety Committee manage the Public Safety strategic planning process and regularly review the strategic and operational framework of the department.

[27] Please see https://www.brandeis.edu/bemco/about/index.html for additional information the mission statement for the Brandeis Emergency Medical Corps.

1.2 Public Safety leaders should create, and the University should require, regular and on-going check-ins with the Campus Safety Committee to ensure Public Safety stays up-to-date on trends and issues on campus that affect strategy and implementation.

SUPPORTING THEME 1.1: ACCOUNTABILITY IN BUPD

Observations

Accountability is a critical component of maintaining trust between the police and the community it serves. The values of respect and dignity should anchor a department's policies the resulting actions of its members. Likewise, the department should be fully transparent in its methods, motives and outcomes. Law enforcement actions should always be open to examination and critical evaluation from internal as well as independent sources. Establishing and maintaining a culture of accountability in a police organization begins with the example set by leadership, and becomes embedded in the procedures and practices of the organization through mentoring, role modeling, and policies that guide conduct and clearly define performance expectations.

> " Accountability is a critical component of maintaining trust between the police and the community it serves.

During our stakeholder interviews, several community members complimented the manner in which BUPD members interact with the community. Several interviewees identified members, by name, as being professional, caring, and approachable. Others, still commended these officers for their service to Brandeis, their welcoming personality, and their ability to demonstrate empathy for individuals with whom they interact. We heard from interviewees that, in the past, officers have received formal recognition from the Department of Community Living (DCL) for their actions and performance. These members of the department can be effective role models for other officers to understand the approaches they use to establish a rapport with the community.

However, we also heard from several interviewees that they have witnessed unprofessional conduct on the part of some officers. Examples included officers that appeared to be unsympathetic to students needing services due to alcohol use, and officers being rude to community members during in-person interactions and during calls to BUPD dispatch. We also received a fair amount of feedback that characterized some officers as unfriendly. Given these two very different perspectives, we are led to believe that some officers treat students differently than they do staff colleagues.

The Brandeis community expects and deserves a high level of accountability in BUPD, and BUPD must carry out its mission in a professional manner. The department must function in an atmosphere that embraces openness, critical evaluation, and robust collaboration with community members. BUPD must develop and maintain avenues of communication to ensure continuous confidence and to nurture trust.

To ensure consistent internal accountability, BUPD should provide on-duty oversight to their officers at all times through the presence of a trained supervisor who has the authority and experience for the expected level of responsibility necessary to direct and supervise. The current structure within BUPD designates sergeants as shift supervisors, with this position having responsibility for the direction of police and security officers, and contract guards. The sergeant serves a critically important role in the direction, development, and supervision of shift personnel. Preparing the shift for their assignments, inspection of officers and equipment, maintaining continuity of operations and holding staff accountable to department policies and practices are just some of the many responsibilities. Perhaps the most important responsibility is to prepare officers for duty by ensuring that they have received appropriate information to conduct their patrols and various responsibilities, supervise their staff, both passively and actively, to ensure they are carrying out their assigned duties. Sergeants have a responsibility to model the behavior expected of all officers and can be instrumental in setting the appropriate tone, demeanor, and professional conduct.

To foster this development and infuse accountability throughout the department, sergeants should respond to all serious incidents and should immediately take charge and deploy resources as needed. BUPD and the University must invest in appropriate training for sergeants both as public safety professionals and as members of the University. Current staffing does not support the presence of a ranking supervisor on duty at all times. We learned that during several shifts per week, a sergeant is not on duty, requiring the senior ranking officer to assume the supervisory role (referred to as the Officer in Charge (OIC)).

"

Establishing and maintaining a culture of accountability in a police organization begins with the example set by leadership, and becomes embedded in the procedures and practices of the organization through mentoring, role modeling, and policies that guide conduct and clearly define performance expectations.

We verified that those who serve as OICs have not received supervisory training and BUPD does not have a policy or other written directive addressing the scope of their duties and obligations while in this role. Seniority alone is not an effective determining factor in the selection of an OIC. The absence of a formal on-duty supervisor or an appropriately trained OIC creates a void in accountability and may increase the risk and subsequent liability of those who have not had the benefit of supervisory training making decisions outside the scope of their intended authority.

In addition to appropriate supervision, community members must have effective and readily accessible confidence that their complaints (or commendations) are receiving the appropriate attention. The current practices of BUPD are informal and do not align with best and promising practices. There is no formal process for sharing the results of the department's review with the complainant, and no policy for sharing complaint data or resolutions with the Brandeis community. By creating, implementing, and sharing complaint procedures that embody respected and predictable processes, BUPD would send a clear signal that it considers complaints in a fair and impartial manner. IACLEA standards state, "The goal of internal affairs is to ensure that the integrity of the agency is maintained through an internal system where objectivity, fairness, and justice are assured by intensive and impartial investigation and review."[28]

In our discussions with the BUPD leadership, we learned that community members generally report complaints about BUPD staff directly to the chief or lieutenant, or through the offices of Human Resources (HR), the Office of Equal Opportunity (OEO), or the Ombudsperson. These University offices were not part of this review and we understand that each office has its own policies and protocols for handling such complaints; however, BUPD does not have any formal policies or procedures to address complaints against its personnel. When campus members have filed complaints with BUPD, the current BUPD practice for handling them is for the chief or lieutenant to review the circumstances that led to the complaint, followed by their determination of a disposition. While BUPD leadership stated that they may refer complaints alleging serious or criminal behavior to the Office of Human Resources, the department has not officially articulated the circumstances under which they would invoke this procedure. In addition to clarifying what situations they may refer to HR for personnel review, we believe that the University should identify an outside, independent resources, preferably someone with a legal or criminal justice background, to investigate complaints of serious consequences, such as use of force, allegations of racial profiling, or other situations that the University determines requires an external review.

One example that supports the need for greater transparency and formal policies and procedures for adjudicating complaints comes as a result of confusion regarding the legal basis for BUPD to enter students' rooms. Several interviewees reported that they believe students filed complaints about officers entering rooms and their behavior during some of these interactions, but felt BUPD took no action and

[28] IACLEA2016, https://www.iaclea. org/assets/uploads/pdfs/IACLEA_ Accreditation_Standards_Manual_ Sept_2019.pdf

failed to follow up with the reporting parties. We were unable to corroborate this assertion, as BUPD does not have a record-keeping system for tracking complaints and resolutions, and the stakeholders sharing the beliefs did not know how or where the complaints were filed. Irrespective of whether students actually filed complaints in this situation, DCL and BUPD must resolve the confusion regarding entering students' rooms, through written protocols and policies to avoid sending conflicting messages to the residents regarding their rights and to help provide a basis for improving the relationship between BUPD and DCL staff.

BUPD leadership informed us that they received fewer than five personnel complaints over the past two years. These complaints were for lower-level incidents of rudeness and/or perceived disrespectful treatment. The leadership team also shared that the University terminated one officer as a result of a HR investigation regarding the officer's conduct.

University offices responsible for receiving and processing complaints provided anecdotal information regarding BUPD interactions with staff and students, but told us that they have not received any formal complaints against Public Safety staff. We were told that the on-line complaint portal, EthicsPoint, has complaints to which BUPD has responded, but no incidents where a BUPD member was the subject of a complaint. Interviewees also shared anecdotal comments from social media about interactions between BUPD and Brandeis community members, but they were not aware of any formal complaints. These interviewees also shared their perceptions that members of the Brandeis community who would not file a complaint regarding differential treatment directly with BUPD because of a narrative about how BUPD would interact with them if they filed a complaint.

Finally, we applaud the establishment and re-evaluation of the charge of the Campus Safety Committee, and envision it serving in an "advisory" role, and not as a "review" board. A "Community Review Board" would need in-depth training, understanding of authority, and would likely require a significant time commitment from members. An "advisory" board, such as the established Campus Safety Committee, on the other hand, can assume some oversight responsibilities without actually performing as review board. For example, the University might consider several sub-committees of the Campus Safety Committee, such as a Policy Review sub-committee to review policies and procedures; and/or a Compliant Review sub-committee charged with reviewing complaints against BUPD members. See for example https://d3qi0qp55mx5f5.cloudfront.net/safety-security/uploads/files/IRC.Charge.February.2018.pdf?mtime=1560978496. Having said this, it is critical for the University to consider the degree of independent oversight it expects the Campus Safety Committee to assume. If the University elects a hybrid model, whereby the Committee has both an advisory role and oversight responsibilities, we recommend the University establish sub-committees of the Campus Safety Committee of the to assume this role, given the distinct roles of each.

Recommendations

1.1.1   Update policies on the expected behaviors of department members and their roles and responsibilities, highlighting members' value and importance to the Brandeis community, as well as the adverse effects of inappropriate performance. Ensure each member receives training and understands the updated expectations.

1.1.2   Involve community members in the development and, when possible, implementation of the policies and procedures.

1.1.3   Ensure a ranking officer, who has received training in police supervision, is on duty at all times. This applies equally to the "officers in charge" and recently appointed frontline supervisors.

1.1.4   Clarify roles, responsibilities and legal issues regarding access to students' rooms by police and/or DCL representatives. Memorialize both a policy and a procedure in writing and schedule joint training sessions for appropriate staff.

1.1.5   Establish a written policy and procedures for the intake, investigation, resolution, and documentation of complaints against the police department and its personnel.

1.1.6   Ensure that the policy includes providing feedback to the complainant on the disposition of their complaint while adhering to rules governing confidentiality of personnel records.

1.1.7   Develop a process for receiving compliments and complaints on the department's webpage to facilitate receipt of community feedback. Publicly post and distribute the complaint procedures, policy, and data. Ensure that data is updated at least every six months.

1.1.8   Invest in a records management system to document complaints, and consider investing in an early warning system. Police departments use early warning systems to track and identify officers' "patterns of behavior to intervene before an officer harms a member of the public, another officer, themselves…, or damages the department's reputation.[29]"

SUPPORTING THEME 1.2: TRANSPARENCY

Observations

The issue of transparency in policing has become a major focus of the defund movement. At Brandeis, the Black Action Plan also calls for greater transparency, and this theme arose in nearly every forum we facilitated. The Final Report of the President's Task Force on 21st Century Policing (the Task Force Report) provides important guidance regarding the connection between transparency

[29] https://www.hillardheintze.com/law-enforcement-consulting/can-early-warning-system-software-improve-police-culture/

and trust, and how a department might go about embracing organizational transparency. Pillar One, *Building Trust & Legitimacy* states that: …in order to "embrace a culture of transparency, law enforcement agencies should make all department policies available for public review and regularly post on the department's website information about stops, summonses, arrests, reported crime, and other law enforcement data." BUPD does not currently make most of this information available, and in several instances, does not compile the information to share.

BUPD leadership routinely provides information on police activities, responses, and criminal investigations to key administrators by means of a daily log report, generated from the department's automated records system. BUPD has provided more detailed reports to University senior leadership, however the media used by BUPD to transmit this information was via a CD-ROM. We heard from the University leaders that they expect a more contemporary method of data delivery. Updating the department's technology for sharing information will be helpful in providing more readily transmitted and understood reports and data. Stakeholders with whom we met confirmed that BUPD leadership generally provides incident reports, particularly those regarding matters involving students, especially when requested. This is an effective practice in providing key partners with timely information. Aside from these information sharing protocols, the department does not routinely share other pertinent information with the wider campus community.

To further the goal of transparency and strengthen the community's trust in the department, BUPD should share information about BUPD staff training and annual reports beyond the limitations of the Clery Act. These reports should include, but not be limited to, department training, community outreach initiatives, organization structure and demographics, contact information, department mission, vision, and values, and strategic plans authorized by the university. Some good examples of higher education campus safety departments with strong transparency practices include:

https://www.police.psu.edu/transparency-and-accountability-initiative

https://usm.maine.edu/police/transparency-accountability

https://www.northwestern.edu/up/facts-and-figures/field-and-traffic-stops.html

https://www.ucf.edu/safety/police-transparency/

https://safety-security.uchicago.edu/police/data_information/

> "…in order to "embrace a culture of transparency, law enforcement agencies should make all department policies available for public review and regularly post on the department's website information about stops, summonses, arrests, reported crime, and other law enforcement data.

The International Association of Chiefs of Police (IACP) has written extensively on the importance of robust communication to enhance transparency and strengthen collaboration between law enforcement and the communities they serve. IACP recently noted that, "Social media has many potential uses for law enforcement agencies. The characteristics of collaboration and interactive communication that are at the core of social media align well with the goals of law enforcement. Social media provides a potentially valuable means of assisting law enforcement agencies in meeting community outreach, problem solving, investigative, and crime prevention objectives. In addition, social media can be used to enhance communication, collaboration, and information exchange; streamline processes; and foster productivity."[30] BUPD does not utilize social media to communicate with the community.

In addition to the use of social media platforms, another important resource to leverage for information sharing is student newspaper. BUPD leadership does not routinely meet with representatives from the student press and there appears to be no on-going effort to establish a relationship with representatives from Brandeis student publications. We understand that BUPD may have some reluctance to engage with student journalists because of past articles that criticize BUPD efforts; however, there is a missed opportunity here to create an avenue for discussing safety and security initiatives, reviewing campus crime-related matters, showcasing positive community-relations activities performed by the police, and establishing an on-going dialog based upon trust and transparency.

Recommendations

1.2.1   Make all department policies publicly available and regularly post information on the department's website about stops, summonses, arrests, reported crime, and other law enforcement data. Collaborate with stakeholders to identify additional BUPD data and statistics to share with the community.

1.2.2   Upgrade the department's records keeping process, related equipment, and IT support to facilitate the delivery of detailed easily understood reports and analysis utilizing state of the art reporting software and contemporary data transmission methods.

1.2.3   Develop a policy and procedure for releasing copies of police reports and department policies consistent with any legal limitations. Make this information available to key stakeholders upon request.

1.2.4   Develop an annual report to include information such as the training of public safety staff, community outreach initiatives, organization structure, contact information, department mission, vision, values, and strategic plans. Make this report available to the community.

[30] https://www.theiacp.org/resources/policy-center-resource/social-media

1.2.5   Meet regularly and develop a stronger relationship with the student press. Utilize this opportunity to discuss campus safety policies and procedures, highlight department services, report crime statistics, and showcase the department's community policing initiatives.

1.2.6   Utilize social media as a communications tool to provide important information to the community and to create a stronger sense of transparency in matters regarding public safety. Continuously highlight the training of police and public safety staff through social media.

> " we believe opportunities exist for increased communication and collaboration between BUPD, University leadership, and key partners to promote a feeling of inclusion and support from the campus community.

SUPPORTING THEME 1.3: ORGANIZATIONAL CLIMATE

Observations

A foundational element of this review was an assessment of the internal climate within BUPD and the impacts the organizational climate may have on the department's ability to deliver high quality safety and security services. Scholars define organizational climate as "the shared meaning organizational members attach to the events, policies, practices, and procedures they experience and the behaviors they see being rewarded, supported, and expected."[31] The impact of organizational climate is even more critical for campus safety departments, since the work product involves the way officers exercise their authority and interact with the community.[32] While the department provides many quality services to the campus community, we consistently heard from members of BUPD that they do not believe that other campus departments view them as equal partners. In light of this perception, we believe opportunities exist for increased communication and collaboration between BUPD, University leadership, and key partners to promote a feeling of inclusion and support from the campus community.

During interviews with BUPD officers, supervisors, and the BUPD leadership team, we found them to be dedicated and motivated individuals who value their role in providing a safe environment for the Brandeis community. However, the majority of department members shared their perception of a lack of support from the University's leaders. For some officers, this translates into a belief that the University has not provided them with the appropriate resources to enable the department to achieve its mission. We understand that the Vice President of Campus Operations began meeting with all Public Safety members to become better acquainted, improve communication through the chain of command, and enhance role clarity. We strongly encourage this initiative, and believe this would

[31]Earhart, Mark G, and Schneider, Benjamin. "Organizational Climate and Culture". Oxford Research Encyclopedia of Psychology. December 2016. <http://oxfordre.com/psychology/view/10.1093/

[32]Tremaine, Tim. "The Importance of Climate in Police Work." 22 March 2017. California Peace Officers Association. https://cpoa.org/importance-climate-police-work/>. Accessed 26 January, 2019

be an excellent opportunity for the Vice President of Campus Operations to provide updates on the goals, outcomes, and progress of this assessment. For other officers, departmental identity and role disparities between the community and BUPD members fuel this disconnect. One BUPD member expressed his displeasure with the community not recognizing his perception of the BUPD role through some community members referring to BUPD as "public safety," noting, "I went to the police academy to become a police officer, not a public safety officer." This sentiment provides some insight into how some officers perceive themselves, and the primacy of their professional role within their sense of self.

BUPD members shared their frustration with the negative focus they believe some members of the community have placed on the department, noting that they don't engage in the behaviors of other officers involved in controversial use of force situations. They do not agree with the characterization that BUPD is "an aggressive department." Many BUPD members believe that at least some, if not all, of the negative attention they are receiving stems from the general perceptions of law enforcement and the national discussion on policing, and not on BUPD's delivery of services or interactions. We confirmed through our analysis of the information gleaned during the campus forums that, generally, many students have a negative impression of BUPD, and those impressions are often reached based on a less-than positive interaction with a BUPD officer and from another student sharing information about a negative interaction they may have had. Nevertheless, it is obvious to us that some members of the department have a blind spot to this issue, and in our professional opinion, the University should surface these impressions with the intent to change the narrative by engaging in initiatives that could positively impact the negative perceptions.

We know through our work with colleges and universities across the country that many campus safety departments are struggling with these same tensions. Like Brandeis, some have taken intentional steps to engage with their campus communities to seek their input on how they can improve the provision of safety and security services and overcome the overwhelmingly negative perception of law enforcement, in general. We know that these "defunding" or "re-imagining" conversations can negatively impact the climate in campus safety departments, if the University does not take steps to ensure members of the department feel valued, understood, and welcomed on campus. BUPD and the community it serves must explore these issues in an environment where frank, mediated discussions can occur about individual experiences, biases, fears, and frustrations. The Brandeis staff, students, and faculty, including BUPD, must commit themselves to engage in difficult conversations in an effort to improve the relationship.

Some BUPD staff indicated that morale within the department is at its lowest point ever and that they are concerned that the department may be facing a period of rapid change that may further erode morale. There is resentment regarding the tone of some messaging from senior university leadership regarding this management

assessment. BUPD staff shared the interpretation of a recent memo from the President calling for the development of plans throughout the University to address systemic racism as labeling BUDP as an institutionally racist department. When we asked how they deal with these frustrations, the response was "we take it to the locker room," meaning that they feel that they have no place to air their concerns within the department, or within the University. This suggests that the staff are not aware of avenues where they can more productively raise their concerns, such as internally through the chain of command, or through University resources such as the New Directions employee assistance program or University Ombuds.

> A change in senior leadership within an organization often provides a chance to shift working relationships within the department and with campus partners.

In an effort to address the climate and culture within BUPD, we recommend the department leadership work with the University's human resources team to conduct an internal, confidential climate survey to capture the perceptions of BUPD staff. Additionally, we recommend that members of the University's institutional leadership team continue to meet with members of BUPD. While in-person meetings may be challenging during the pandemic, BUPD and University leadership must find creative ways to keep open lines of communication to promote feelings of inclusion and respect.

In our opinion, the hiring of a new Chief of Public Safety presents an additional opportunity to address the organizational climate issues mentioned in this section. A change in senior leadership within an organization often provides a chance to shift working relationships within the department and with campus partners. It will be critical for the new leader to be involved in the Public Safety strategic planning process so that they can solicit input from all DPS employees on the process with the goal of increasing feelings of shared ownership and "buy-in" from all department members.

We feel strongly that the University should immediately consider offering officer wellness and resiliency orientation for all department members. While we understand the University provides counseling services through existing support structures for all employees, we know that those providing these services must have a professional background and experience with the unique challenges facing the first responder community. We know that these support systems can work to provide department members with the tools and coping strategies to enable them to continue to provide professional safety and security services to the Brandeis community.

Finally, working the University's human resources department, the new Chief of Public Safety or their designee should continue to conduct exit interviews when employees resign or retire from the department. Conducting exit interviews can provide a view into the culture, climate, and morale within the department and

can work to provide leadership with an opportunity to address future employee concerns. Additionally, exit interviews can validate:

- Leaders care about what employees think;

- The organization is continuously evolving and changing; and,

- Leadership is committed to the organization's core values.[33]

Recommendations

1.3.1 Schedule a mandatory meeting of all DPS personnel with the Vice President of Campus Operations to improve communication, increase role clarity, and enhance the dialogue between the Administration and the department. Provide updates from the Vice President on the goals, outcomes, and progress of this assessment.

1.3.2 Consider a climate assessment within BUPD.

1.3.3 The new leader should use the results of the climate assessment to address the climate and culture challenges.

1.3.4 Representatives of the University's leadership team should periodically meet with the department to show support and open lines of communication.

1.3.5 Identify resiliency, mindfulness and mental health programming to meet the wellness emotional needs of DPS members.

1.3.6 Conduct exit interviews of employees who leave or retire from the department.

Major Theme 2.0: Adopt an Alternative Response Program

Observations

There was universal agreement during the forums and our interviews with campus constituents that the University should adopt alternatives to sworn officers responding to every call for service received by the University Police Dispatch center. An alternative response model would ensure that the University pairs the appropriate campus (or local community) resource to match the stated needs of the individual requesting services. In fact, the concept of "alternative response" was a major theme arising from the campus forums, with participants characterizing the current process of sending a BUPD member to all calls for service as "broken," and out of sync with the needs of current students and other campus members. Participants suggested a "community of care" model, where the University provides other, alternative resources for calls that do not signify the need for a sworn officer.

Even within an alternative response program, forum participants noted the need for officers to be fully trained to respond to a wide variety of situations, including understanding de-escalation methods and how to respond to an

[33]Levin, Marissa. "3 Reasons Why Good Exit Interviews Are Important to Your Culture, and How to Do Them Right." Inc.com. 6, June 2018. Accessed 7, Feb 2019

individual experiencing a mental health crisis. Most participants were not aware that BUPD officers had received training in de-escalation, further supporting our recommendation that the department adopt robust transparency initiatives on a wide range of policies, practices, and other metrics in line with Pillar 5 of the Task Force Report, Campaign Zero, and the Black Action Plan. We address this further in Supporting Theme 4.3: Public Safety Training.

The key to an alternative response program is ensuring that the alternative is identified, trained and available on 24/7, and managed by an appropriate supervisor. This requires building the program from the ground up, identifying sources for alternative resources (hiring), and managing the program. While many participants suggested that the University already has its own Counseling Center, the development of the program will likely rely on resources not currently in the University's employ. Several forum participants suggested that the University's volunteer EMT unit, BEMCo, may be an appropriate and solid foundation on which to build these alternative resources because of its primary mission of ensuring the community's health and safety and its respected reputation of delivering professional services. Because BEMCo is a student-managed organization, and therefore only in operation when classes are in session, we believe the University would need to invest in additional infrastructure for 24/7 counseling and mental health first responders.

Participants most notably addressed concerns about sending sworn officers to situations that potentially involve a behavioral crisis, tracking with national concerns regarding police response to these types of calls. As noted in the flurry of articles addressing this issue, the movement to remove police from mental health calls is highly complicated, yet, demands immediate action.[34] For example, the San Francisco Police Department announced in October 2020 that it will remove officers from first response, instead deferring these calls to unarmed mobile teams comprised of paramedics, mental health professionals, and peer support counselors.[35]

The Crisis Intervention Team (or CIT) approach, developed by the National Alliance on Mental Illness, is one that has gained momentum over the past several years, and provides a solid foundation from which to envision this program.[36] In the interim, the University should consider additional alternatives, including deploying some of its existing Counseling Center staff members for off-hour, in-person response, collaborating with local resources, such as the Wayside Youth & Family Network or working with the Waltham Police Department, who provides CIT training to members of its department. We are also aware that in early 2020, BUPD leadership was arranging for all of their staff to receive training on police response to individuals experiencing a mental health crisis, but leadership had to postpone this training for reasons related to the pandemic.

Aside from calls that may involve a psychological, behavioral, or substance abuse crisis, participants also cited the need to remove sworn officers from other

[34] See for example https://www.brookings.edu/research/innovative-solutions-to-address-the-mental-health-crisis-shifting-away-from-police-as-first-responders/, a report that outlines efforts taking place across the country.

[35] Please see: https://www.npr.org/2020/10/19/924146486/removing-cops-from-behavioral-crisis-calls-we-need-to-change-the-model

[36] https://www.nami.org/Advocacy/Crisis-Intervention/Crisis-Intervention-Team-(CIT)-Programs

calls that do not require such an officer. These calls include lock-outs or other key related situations; noise complaints; building or area security checks; wellness calls; medical transports; and others. We are aware that the University began this long-term process and we encourage them to continue with alacrity. In 2019, Public Safety hired and trained student workers to be on premise during certain student events in lieu of a police detail. And in November 2020, the University shifted lock-out responsibilities from BUPD to the DCL.

We analyzed both 2020 and 2019 data sets for BUPD's activity as logged in their Computer Aided Dispatch system (CAD). We recognize that not all calls for service require the same number of officers or the same time investment. Nevertheless, in the current operating paradigm, each CAD activity logged requires at least one sworn officer to respond, triage, and possibly provide additional services. Because of the impact of the pandemic on the University's environment and operations, and because BUPD could only provide 2020 data through November of that year, in this report we focus on the 2019 datasets. We note, however, that our analysis of the 2020 provided data tracked similarly to the 2019 data, and for all intents and purposes provided comparable results.

We did not include the over 11,600 additionally recorded physical security checks of Brandeis buildings and grounds in our analysis because we do not consider these calls for service in the truest sense of the phrase. We refer to the remaining CAD activities as Calls for Service (CFS), to distinguish them from these physical security checks. That said, Brandeis should consider that physical security checks,

in and of themselves, may serve as a deterrent to criminal activity and remain key components of a campus security program. In our opinion, non-sworn staff could perform these checks to provide an effective deterrent and to identify issues such as broken locks and open windows that building staff should address to keep facilities secure. In the 2019 data provided, BUPD recorded just over 12,000 CFS to which sworn officers provided some type of response and service, represented in **Table 1**, below.

Table 1 - BUPD 2019 Calls For Service (CFS)
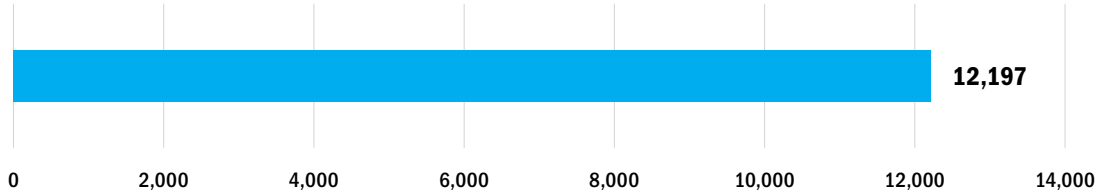
We categorized these CFS as either law enforcement, non-law enforcement, or administrative responses, as outlined below. **Table 2**, below, shows the distribution of the CFS in the three categories:

Table 2 - BUPD 2019 All Calls For Service (CFS), N=12,167

Administrative   Non-Law Enforcement   Law Enforcement
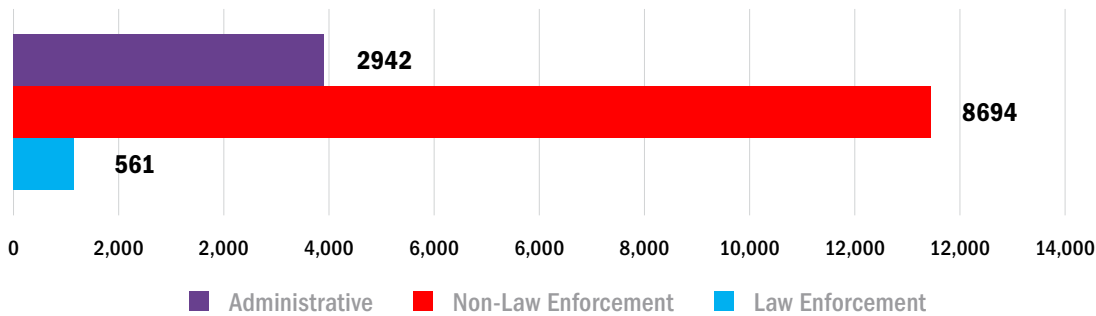
Law enforcement calls account for approximately 4% of the annual CFS total, across both years. These calls include responses to panic and intrusion alarms, calls to assist Waltham Police, response to serious crimes (such as sexual and gender-based violence incidents, burglaries, bomb threats, and death investigations), as well as other lower-levels offenses such as thefts (the most frequent), vandalism, warrant services, vehicle collision investigations, and trespass complaints.

Non-law enforcement calls record the number of times BUPD officers were called to attend to medical transports, checking on the well-being of others, key service, noise complaints, non-criminal alarms, facility-related requests, motorist assists, parking complaints (parking staff not on duty or busy), traffic control, and animal complaints. These calls account for 71% of all CFS.

Administrative calls record various administrative tasks performed by officers, such as report writing, roll call, attending training, vehicle maintenance, and other non-response activities. For the most part, these activities do not constitute traditional calls for service. **Administrative** calls account for 24% of all CFS. Because these types of calls are not influenced by the presence of an alternative response strategy, we remove them and focus only on the Law Enforcement and Non-Law Enforcement calls for service for the remainder of this report. This is represented in **Table 3**, below.

Table 3 - BUPD 2019 Law Enforcement and Non-Law Enforcement CFS, N=12,167
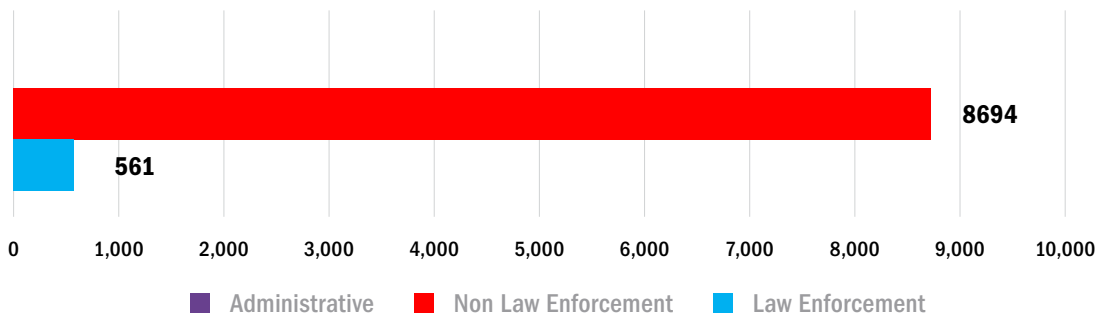
In our analysis of the data within the **Non-Law Enforcement CFS**, we determined that BUPD responds to 80 calls annually to determine an individual's well-being. Of these, 16 persons were determined to need transportation for further evaluation. As we noted earlier in this section, law enforcement response to, and presence at, mental health situations warrant particular consideration for alternative response by appropriately trained resources. Additionally, we identified 350 emergency medical calls for which BUPD simply provides building access for the responding BEMCo emergency medical crews and, very occasionally, transport in an unmarked vehicle to a medical facility if an ambulance is not required. While we understand that the intent of the transport is to address a recent student ask for the "use of 'more sensitive' transportation options than a police cruiser for student emergency situations,"[37] this practice, regardless of the type of vehicle employed, creates considerable risk to the individual being transported, the officer, and the University. One can imagine a wide range of unacceptable consequences arising from this practice.

We further identified another 21% of all calls among the data within the **Non-Law Enforcement CFS** that may require an elevated of level of skill, but not necessarily a sworn law enforcement response, such as fire alarms activations, preventative security/foot patrols, money escorts, and fingerprinting services. Sworn officers would continue to all calls for service where there are indications of a crime in progress or the presence of other any type of violence. We re-categorized these

[37] https://www.thejustice.org/article/2019/05/students-protest-racist-policies-brandeis

calls, subtracting them from the **Non-Law Enforcement CFS** line and adding them to the new line we call **Total CFS Alternative Response** in **Table 4**, below.

Table 4 - 2019 Partial Alternative Response, N=12,167

Legend: ■ Alternative Response (2,582) ■ Non-Law Enforcement (6,112) ■ Law Enforcement (561)
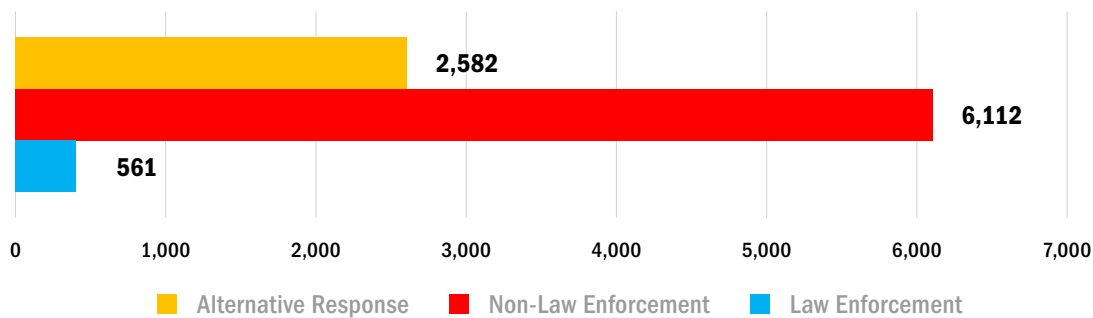
We believe that there are "low-hanging fruit" candidates for **alternative response**. Using a reasonable approach to alternative response, we suggest that Brandeis can alternatively dispatch the bulk of the calls in the residential housing setting to 1) students designated as community resource coordinators; or, 2) to an existing resource such as RAs, desk coordinators, etc. If the University does not make these resources available 24/7, it would need to designate primary and secondary responders.

Similarly, Brandeis could designate a 24/7 Facilities Administration resource to respond to all "facility" related calls. We understand that, in conjunction with the creators of the Black Action Plan, the University developed an alternative response protocol for lockouts that launched in November 2020, transferring these responsibilities to DCL staff. Based on the calls for service data BUPD provided from 2019, residential lock-outs account for 13% of the total BUPD calls for service. In addition to reducing workload for BUPD, adopting this alternative response could have reduced sworn officer presence for non-law enforcement requests for service in residential spaces by as many 1,500 instances in 2019.

Additional Considerations for Utilization of Un-armed, Skilled Responders

We are aware that some law enforcement agencies are considering alternative response to non-violent incidents, violations, and crimes. These CFS may be criminal in nature, traditionally associated with a law enforcement response, and likely requiring a trained first responder but may not require a sworn officer.[38] These responders could, minimally, record the initial report, providing the information to other BUPD officials for appropriate follow up. These incidents include lower-level crimes such as trespass complaints, crash response and investigations, reports of theft and vandalism, and perhaps, traffic control. Sworn officers would respond to only major and violent crimes, and conduct follow up to appropriate investigations, as necessary. In this regard, we further analyzed the **Law Enforcement CFS** to identify how many low level, non-violent criminal calls for service among them

[38]See for example, https://www.portlandoregon.gov/police/article/705502. Portland describes these officers as: "…performing law enforcement related community service work that does not require the enforcement authority of a sworn police officer."

BUPD might also defer to trained, unarmed personnel. We re-categorized these calls, subtracting them from the **Law Enforcement CFS** line and adding them to the **Alternative Response CFS** line (see **Table 5 below**).

Table 5 - 2019 Full Alternative Response, N=12,167
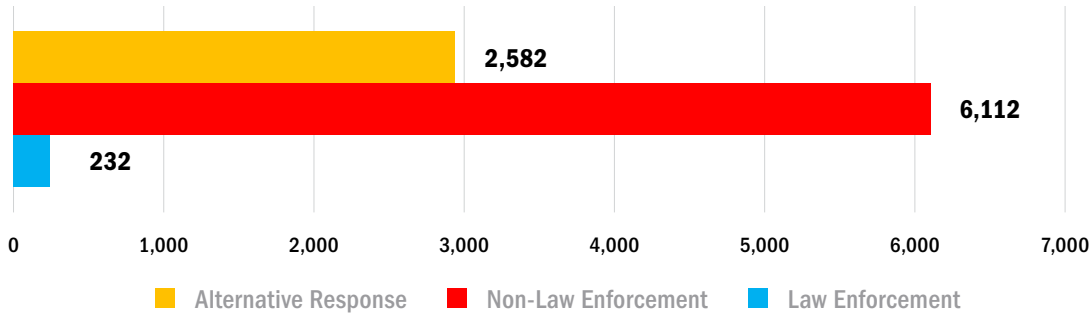
Assigning trained alternative responders to these calls reduces the **Law Enforcement CFS** by half, though we reiterate that the alternative responder must have the necessary skills to produce a legally defensible document should the incident elevate to a civil or criminal proceeding. Before considering an alternative response by non-sworn personnel, BUPD should consult with General Counsel to ensure they address all legal concerns. BUPD must also continue to provide resources to investigate these crimes, process evidence, attempt to identify the person(s) responsible, identify trends, and develop appropriate prevention strategies and education, as needed.

Of course, with all alternative response options, the University will need to provide appropriate training to provide the necessary skills, and ensure individuals understand the boundaries under which they work and when it is appropriate to escalate the response.

> "...the University should consider adding well-trained non-sworn staff that can assume the bulk of the non-LE calls, potentially leading to the identification of resources currently invested in Public Safety that the University can re-distribute to other offices to more appropriately align the skill sets of the responding staff with the situation.

We suggest the University consider adding well-trained non-sworn staff that can assume the bulk of the **Non-Law Enforcement** calls, potentially leading to the identification of resources currently invested in Public Safety that the University can re-distribute to other offices to more appropriately align the skill sets of the responding staff with the situation.[39]

Based on feedback from forum participants, the University should consider that unreported crimes and incidents may have occurred but community members did not report them for reasons such as a perceived lack of faith in the local or state criminal justice system, or previous disappointing or traumatizing encounters

[39] https://www.brandeis.edu/president/letters/2020-06-09-transforming-our-campus-to-eliminate-systemic-bias.html

with police. While it is impossible to predict the outcome of achieving a more welcoming, transparent, and accountable campus safety department, the University may experience a potential uptick in reported crimes as its community increases its trust in BUPD to respond and interact appropriately.

Finally, it is important to underscore the important role that dispatchers play in an alternative response model. It is our current understanding that BUPD officers who serve in the BU Police Dispatch Center have not received industry-accepted telecommunicator training.[40] The University will need to first resource the dispatch operation so that call-takers/telecommunicators have the appropriate training and certification to staff the dispatch center. Second, the University will need to train dispatchers to recognize the nature of the call, and quickly identify the appropriate and available alternative responder. This is a complex task that will require significant oversight and adjustment as the University evaluates the transactional nature of the responses and desired outcomes.

" *While it is impossible to predict the outcome of achieving a more welcoming, transparent, and accountable campus safety department, the University may experience a potential uptick in reported crimes as its community increases its trust in BUPD to respond and interact appropriately.*

Recommendations

2.1 The University should immediately develop an interim plan, with the Campus Safety Committee, and other appropriate stakeholders , to address the concept of an alternative response program and outline associated procedures. This plan should address, minimally:

– Matrix of activities/types of calls and response suitability;

– Identification of alternate resources. Some of these resources may come from existing offices at the University, and the University may need to create new positions;

– Development of appropriate dispatch and response policies and procedures;

– Appropriate training and expectations for all responders;

– Legal and compliance issues; and,

– On-going analysis of CFS data to ensure the continued availability of appropriate personnel.

[40]See for example, Telecommunicator training standards established by the Association of Public-Safety Communications Officials (APCO), International at https://www.apcointl.org/training-and-certification/disciplines/public-safety-telecommunicator-pst/public-safety-telecommunicator/

2.2 The University should prioritize formulating an alternative response to individuals in mental health crisis, such as NAMI's Crisis Intervention Team program or Eugene, Oregon's CAHOOTS (Crisis Assistance Helping Out On The Streets) model.

2.3 The University should re-evaluate its current practice of dispatching a law enforcement officer to medical calls for service, and determine an alternative resource for EMS personnel to gain access to facilities. We acknowledge that police response may be required for some of these calls, especially those where there is an indication of an injury as a result of a crime, or that some other crime may have occurred. The underage possession of alcohol, a typical situation that may have heretofore generated a BUPD response to a residence hall, we do not agree that a sworn officer response is necessarily needed in these situations, and that a Community Living and BEMCo response could be adequate in most underage drinking incidents. We remind Brandeis of its Clery Act-reporting obligations in these situations.

2.4 BUPD should immediately identify and provide training for telecommunicators and ensure all personnel performing this function receive this training.

2.5 The University should consider adding a minimum of 6 dispatch/telecommunicator positions to professionalize the service, implement alternative response protocols, and reduce liability.

Major Theme 3.0: Develop an Evidence-Based Strategy for Engaging with the Campus Community

Observations

> **"those that have been traumatized by police or have a genuine concern for their safety and treatment by authorities, a traditional police uniform can prompt unintended consequences.**

Engagement is a shared responsibility that requires intentional efforts by both Public Safety and the campus community. The department needs a community centered, data-driven and informed strategy designed to appropriately address crime concerns, build meaningful relationships with campus members, and provide crime prevention and harm reduction programming on campus. It is especially important that the strategy be developed with sensitivity to the different types of engagement desired by various campus constituents.

It was evident during the forums that, despite negative feedback we received from several forum participants regarding their perceptions of Public Safety, many nevertheless desire an engaged department of public safety, and one that is fully transparent regarding its role and how it conducts its work, and is open to feedback relative to several dimensions of its performance. During our interviews with campus partners, many also supported the desire for a more engaged and

professional campus safety team. As previously noted, many BUPD members also indicated their desire to participate in substantive partnership building initiatives. We should highlight that some forum participants noted that BUPD "shows up," during times of crisis or need, with one attendee sharing that there are a "handful of amazing officers" who should be celebrated. Interviewees participating in the department review also cited their general satisfaction with the response they receive during complicated situations. Unfortunately, forum participants also voiced a fair amount of displeasure with the ways that some BUPD officers respond to situations, noting that "they feel like they were imposing on BUPD when they request services."

With respect to engaging in a positive manner with members of the campus community, participants consistently raised questions about how officers present themselves, vis-à-vis their uniforms and associated equipment (i.e. "they symbolize more of a militaristic law enforcement entity versus approachable member of the community.") Some campus members suggested that the uniform and firearm negatively impacts their willingness to engage with officers, adding that "those that have been traumatized by police or have a genuine concern for their safety and treatment by authorities, a traditional police uniform can prompt unintended consequences." Certainly, members of the community who have previously directly or indirectly experienced negative interactions with police may have particular reactions to a Brandeis fully uniformed officer. We view this sentiment as an opportunity to re-think how the University uniforms and equips its officers, with a realization that officers are required to carry multiple items, most of which is essential to a competent response. Having said this, we believe the University should raise these questions during the Public Safety strategic planning process.

Finally, regarding the context for a thoughtful engagement strategy, many forum participants spoke about their perception of the lack of diversity within Public Safety. Attendees suggested that if the University expects the community to engage with Public Safety, it must work to ensure that all types of diversity (including ethnicity, gender, nationality, and sexual orientation) are represented within the department. Again, these sentiments support the need for, and our recommendations calling for, greater transparency.

The University should address the issue of diversity within the ranks of BUPD, as it is with other University departments as part of its Diversity Composition initiatives[41] and in any other resources assigned to the differential response program. With respect to how BUPD members interact with the campus community, and especially with members of traditionally disenfranchised groups, we suggest that Public Safety embrace the concepts of procedural justice and weave these concepts throughout the department.[42] Procedural justice strategies emphasize respect, neutrality, and transparency in the exercise of authority, while providing opportunities for those with whom officers interact to explain their side of events. We are confident that the adoption of procedural justice and appropriate training will address concerns about interactions with diverse groups and the matter of improving quality customer service.

In our opinion, a formalized engagement strategy, based on promising practices in evidence-based community policing , will not only benefit the Brandeis community so individuals can feel safe on campus, but they also will create intentional opportunities for Public Safety staff to engage with the Brandeis community in a positive and proactive manner.[43] During its strategic planning process, the University should reach consensus on what community policing means to the Brandeis community and how the University will operationalize its concepts at Brandeis University. We are keenly aware that many activists in the defund movement have dismissed community policing as a viable strategy for transforming policing to a truly community-centered service provider.[44] While we acknowledge that some in the policing community have used community policing as a catch-all term to apply to any *and* all efforts intended to regain legitimacy and engage with their communities, we continue to believe that community policing, when adopted wholesale and with fidelity to the foundational principles, remains a core and viable approach and philosophy to addressing concerns regarding equitable and unbiased police services. We are not suggesting that the adoption of community policing will solve the very real problem of disparate treatment of people of color, including the killing of unarmed black people; rather, we submit that community policing, in its foundational concepts, has a place in a re-imagined policing, and in this case, campus safety, paradigm.

[41] See 2018 Diversity, Equity and inclusion Update https://www.brandeis. edu/diversity/pdf/dei-update-ay-2018. pdf, p. 5, posted on https://www. brandeis.edu/diversity/about-us/ history.html and https://www.brandeis. edu/diversity/updates-statements/ index.html

[42] See for example: George Wood, Tom R. Tyler, and Andrew V. Papachristos, Institute for Policy Research, Northwestern University, Evanston, IL 60208; Yale Law School, Yale University, New Haven, CT 06511; and Department of Sociology, Northwestern University, Evanston, IL 60208

[43] See for example: https://cebcp.org/ wp-content/evidence-based-policing/ IACP-GMU-Evidence-Assessment- Task-Force-FINAL.pdf. Lum, C., Koper, C.S., Gill, C., Hibdon, J., Telep, C. & Robinson, L. (2016). An Evidence Assessment of the Recommendations of the President's Task Force on 21st Century Policing — Implementation and Research Priorities. Fairfax, VA: Center for Evidence-Based Crime Policy, George Mason University. Alexandria, VA: International Association of Chiefs of Police.

[44] https://aworldwithoutpolice. org/2017/10/08/the-problem-with- community-policing/

> **we submit that community policing, in its foundational concepts, has a place in a re-imagined policing, and in this case, campus safety, paradigm.**

We recognize that current Public Safety staffing limits the department's ability to pursue many of the more urgent recommendations in this report, including updating policies, creating transparency initiatives, and constructing a robust engagement strategy. We also recognize the dissonance between BAP demands to "defund" and our recommendations that call on the University to invest more in the campus safety apparatus (but not in sworn positions). We are confident that near- and mid-term investments will address many of the more pressing issues in this report, and that, in the longer term, the University may be able to further re-distribute resources out of Public Safety and into other pressing safety and wellness programs.

The University should rely on the recommendations from the President's Task Force on 21st Century Policing as a framework for the development of a comprehensive community policing and community engagement strategy (https://cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf). Points within the Final Report that are particularly important for the University to consider include:

- Community policing should be infused throughout the culture and organizational structure of law enforcement agencies.

- Law enforcement agencies should create opportunities…for positive non-enforcement interactions with police. Agencies should also publicize the beneficial outcomes and images of positive, trust-building partnerships and initiatives.

- Law enforcement agencies should adopt model policies and best practices for technology based community engagement that increases community trust and access.[45]

In order to be successful with these initiatives, Public Safety will need to identify or hire appropriate staff who can write well and present information in a professional, yet conversational fashion. These individuals must keep abreast of the way 18- to 24-year-olds prefer to receive information (i.e. Twitter, Instagram, Snapchat, etc.) leveraging the ever-changing toolkit of social media, which the department currently lacks. In our opinion, Public Safety is currently missing the opportunity to communicate with the campus community by not being present on Facebook, Twitter, Instagram, and other social media platforms currently used many members of the University community. It is also important to note that the person selected for this position may not come from within the University or from a law enforcement

[45] Brandeis Public Safety does not currently have any of these initiatives.

background. We encourage the University to consider individuals for this role that have a proven record of working within the community building, student development, victim advocacy, social work, or social justice communities. The role of the community engagement coordinator is to work with campus groups to identify campus safety problems, and suggest appropriate resources to address them, and to organize programs and activities to help build positive relationships between the department and the campus community.

The 21st Century Policing Task Force emphasized the importance of citizen/community collaboration and engagement to improve trust between law enforcement and the public. One way campuses have worked to improve communication between the campus safety entity and the campus communities is by creating a campus safety advisory committee[46]. We were pleased to learn that the University has recently formed a Campus Safety Committee, chaired by the VP for Campus Operations and comprised of internal stakeholders whose formal charge is to: "Formalize collaboration and communication about campus safety among stakeholders across campus." The tasks of the committee are to:

- Educate committee members on campus safety and emergency management;

- Consider and recommend new policies to the University leadership that enhance campus safety and emergency preparedness;

- Review and consider standards for campus safety related to security related equipment/systems, protocols, and training; and,

- Review and comment on developing emergency planning documents.

In order for this committee to be effective and maintain its credibility, the University should intentionally emphasize that the Campus Safety Committee is independent of Public Safety and not simply serving at the will of the Public Safety leader. In line with this concept, we recommend the University consider a co-chair model with the VP, Campus Operations sharing leadership responsibilities with a University official completely independent of Public Safety. The University should consider a faculty or staff member from Sociology, Politics, African and African-American Studies or the cultural centers The University must ensure the committee co-leader is unbiased, independent, and familiar with the issues surrounding the current reform movement.

The committee must work to identify relevant campus safety issues, work collaboratively to develop strategies to address pressing issues, collect data to ensure these strategies are achieving their desired outcomes, and share its work with the campus community.

[46]We want to be careful to distinguish between this body and a "review" committee that may be charged with reviewing policies, training, use of force incidents, and citizen complaints.

Recommendations

3.1   Identify a community engagement coordinator whose role is to work with campus groups to identify campus safety problems and identify appropriate resources to address the problems and to organize programs and activities to help build positive relationships between the department and the campus community.

3.2   Continue to support the work of the Campus Safety Committee by formalizing role and responsibilities within the University's hierarchy and requiring periodic, public reporting.

3.3   Refer to the Final Report of the President's Task Force on 21st Century Policing as a guide to develop a policy that outlines the department's community policing and community engagement strategy. See for example, the strategic plan developed by the San Francisco Police Department (https://www.sanfranciscopolice.org/sites/default/files/2020-11/SFPDCommunityStrategyPlan.20201102.pdf); the University of Illinois (https://police.illinois.edu/about/strategic-plan/), and the University of Utah (https://safety.utah.edu/strategic-plan/).

3.4   Develop metrics to determine the effectiveness of the department's crime prevention, community policing, and community engagement strategy. These metrics should be part of an overall data "warehouse," that encompasses of wide range of information the department should be collecting and how it should share this information with the community. See for example the data portal for the University of Chicago Police Department at https://safety-security.uchicago.edu/police/data_information/.

3.5   Develop a survey tool to determine what campus engagement initiatives are of interest to the Brandeis community. Forum participants identified multiple opportunities for Public Safety to shift the narrative regarding the value it provides to the campus community.

3.6   Where possible, use data from incident reports and other community feedback (including the Campus Safety Committee) to identify opportunities to create crime prevention and safety awareness programming.

3.7   Provide evidence-based community policing, campus engagement, and procedural justice training to all Public Safety staff.

> **Key campus stakeholders, especially those in Student Affairs, are essential partners in this relationship, and in some cases, may, in fact, be (or will become) a campus safety service provider.**

SUPPORTING THEME 3.1: IMPROVE COLLABORATION WITH CAMPUS PARTNERS

Observations

Effectiveness in campus safety relies on the development and sustainment of substantive relationships with key campus partners. These partnerships facilitate role clarity, responsibilities, expectations and outcomes, along with building consensus on the appropriate metrics to measure the health of the partnership. Community Policing is not merely a series of programs or projects. It is a philosophy which involves developing community partnerships to create problem-solving approaches to address issues that affect the community, and in the age of "differential response alternatives," these partnerships are essential to providing the appropriate resources to campus members. Key campus stakeholders, especially those in Student Affairs, are essential partners in this relationship, and in some cases, may, in fact, be (or will become) a campus safety service provider.

Our interviews with campus stakeholders resulted in mixed reactions to the questions regarding the strength of collaboration between the Public Safety and the Brandeis community. Based on this input, we

> " ...Enhance...working relationships with DCL, Student Health Services, Emergency Management, and Facilities Services.

believe there is a compelling need for Public Safety to enhance the quality and depth of its working relationships with campus partners in student affairs, writ large, but in particular, in DCL, Student Health Services, Emergency Management, and Facilities Services. We recognize that the Chief has served as the primary point of contact with many of these partners and is, to many, the department. However, line officers and supervisors within BUPD are at the frontline of student interactions, and every member should be working with these key campus stakeholders to share information, collaborate on projects, ensure alignment with campus safety priorities, and otherwise participate in initiatives regarding campus safety and security. As noted throughout this report, BUPD members signaled their willingness to assume a more active role in maintaining partnerships, with students, staff, and faculty.

Most campus partners that we interviewed characterized department leadership as responsive, stating that the Chief attends important campus meetings and contributes valuable input to the various committees in which he participates. Several community members commended the Chief as being a caring member of the Brandeis community with significant institutional knowledge.

The Chief's management style is described as being "hands on" where delegating within his organization for administrative responsibilities is largely confined to himself and Lieutenant Riley. Campus partners widely praised Lieutenant Riley as thoughtful, empathetic, competent and committed to the department and the University. It was obvious to us that many members of the Brandeis community hold both the Chief and Lieutenant in high regard.

We believe that the next leader should engage additional department members in the process of building and sustaining these important relationships so that the efforts are shared throughout the department.

Recommendations

3.1.1   Ensure the strategic plan mentioned throughout this report elevates campus partnerships as a primary goal, with supporting objectives. Within this plan, prioritize the establishment of a stronger working relationship with DCL, Dean of Students and the Office of Equal Opportunity.

3.1.2   Engage key stakeholders to assist the department in identifying approaches to improve intra-communication.

3.1.3   Reassign routine administrative tasks currently performed by the Chief and Lieutenant to a support staff position.

3.1.4   After appropriate orientation and understanding of scope and role, involve the sergeants in community meetings and campus committees to foster broader participation and understanding of community needs and problem-solving opportunities.

SUPPORTING THEME 3.2: SUSTAIN COORDINATION WITH EXTERNAL PARTNERS

Observations

In today's campus safety environment, colleges and universities must establish solid working relationships with their local law enforcement partners and other emergency first response organizations. Establishing good lines of communication, entering into formal letters of agreement, determining how agencies will share resources, identifying staging areas and evacuation routes, and ensuring radio interoperability are all essential when planning for, and responding to, critical incidents. We are well aware that "divesting" from local law enforcement agencies is a familiar refrain in the defund movement. We, however, believe that institutions will continue to rely on support from law enforcement departments, and any considerations towards divesting should include a thorough examination of the attendant outcomes.

In conversations with members of BUPD, we learned that the department receives emergency response support from the Waltham Fire and Police Departments (WPD and WFD respectively). According to the Chief and other members of the department, we learned that BUPD enjoys a good working relationship with these departments and they routinely collaborate on public safety issues currently impacting both communities.

While conducting our analysis, we did not find nor were we provided with any Memorandum's of Understanding (MOUs) between the University and the local

agencies. We believe the University should consider executing formal agreements with local first responders, as these agreements formally establish the operational framework under which these agencies interact during a campus critical incident. In addition to establishing the operational framework, these MOUs should identify specific roles and responsibilities between agencies related to the investigations of misdemeanors and felonies occurring on campus, including sexual assaults. While we understand that MOUs are not always feasible, formal articulation of expectations and roles between interacting departments is ideal. In the absence of an MOU, it is imperative that BUPD continue to work with local, state, and federal first response partners to ensure the seamless deployment of resources during an emergency on campus.

In conversations with WPD, we learned that they frequently work with BUPD on training and crime prevention initiatives. WPD assigns two members of its department to act as liaisons to BUPD to share information on local crime trends and to ensure both departments are aware of areas of concern that may negatively impact both communities.

WPD spoke highly of the professional relationship they have with Chief Callahan. We believe the department should consider involving additional members of BUPD in these relationships to further build rapport, and establish trust and confidence. Assigning other department members also creates opportunities for development for BUPD members. We acknowledge that BUPD is a relatively small department and therefore may find it difficult to provide additional staff to liaise with these agencies individually; however, in our opinion, these important relationships warrant the investment.

In our conversations with BEMCo staff, we did discover that BEMCo has a Memorandum of Agreement (dated 3-26-2013) with Cataldo Ambulance Service of Massachusetts. This agreement appears to include the information needed to provide emergency medical services to the campus. We find it encouraging that a student-managed program has a well-developed Memorandum of Agreement with a local ambulance service, and recommend that BUPD develop these agreements with other service providers. BUPD should use this existing agreement as a model when pursuing the agreements described above.

We applaud the University's recent hiring of a director of emergency management. The director is essential to building an emergency management program for planning for, responding to, and recovering from a critical incident on campus. The emergency director shared that he has recently been working with internal and external stakeholders to develop a comprehensive Training and Exercise Plan (TEP), designed to test and evaluate existing emergency preparedness plans, policies, and procedures. While the emergency management function was not a key focus area of our work, our review of this document found that it aligns with federal guidance and contemporary emergency management practices. We understand

that the University's administration has not yet approved this TEP and encourage the emergency manager to continue to move forward with this important training and exercise initiative.

The tragedies at University of North Carolina at Charlotte[47] and Florida State University[48] highlight the fact that no single agency or department has all the resources or equipment necessary to respond to large-scale incidents. BUPD in collaboration with the University's Emergency Manager must continue to build upon the existing relationships with its emergency response partners to ensure the University is prepared to respond effectively during emergencies.

> **Public Safety should undertake a comprehensive review of its policies and procedures**

Recommendations

3.2.1   BUPD should consider identifying additional members of the department to serve as formal liaison officers with the Waltham Police, Massachusetts State Police and the FBI's local campus liaison special agent.

3.2.2   Continue to work towards the approval and implementation of the Training and Exercise Plan. This plan should identify a comprehensive strategy designed to test and evaluate existing crisis response plans, policies and procedures.

3.2.3   Develop Memorandum's of Understanding with local emergency response agencies that provide the operational framework for these agencies when responding to a critical incident on campus.

Major Theme 4.0: Review and Update Appropriate Policies, Procedures, and Supporting Infrastructure

SUPPORTING THEME 4.1: IMMEDIATELY DEVELOP A COMPREHENSIVE WRITTEN DIRECTIVE SYSTEM

Observations

Public Safety should undertake a comprehensive review of its policies and procedures (together, referred to as a written directive system) to ensure they meet contemporary practices and rapidly evolving standards in campus safety. This is particularly relevant given on-going calls to reform police practices to eliminate illegal and dangerous use of force techniques, the various edicts from Federal and state officials[49], and guidance from national law enforcement associations.[50] Our analysis of the policies related to high liability areas, such as use of force, vehicle pursuits, response to mental health crises and internal affairs determined that the department's policies do not meet contemporary standards. We also discovered a number of different department policy manuals in circulation that contain policies that are in direct conflict with one another.

[47] Haley Walters, April 30th, 2019, UNC Charlotte Shooting Among Recent Shootings on North Carolina Campuses, Greeneville News, https://www.greenvilleonline.com/story/news/2019/04/30/unc-charlotte-shooting-among-recent-shootings-nc-college-campuses/3634488002/

[48] Faith Karimi and Jethro Mullen, November 20th, 2014, Three Shot at Florida State University before Gunmen Killed by Police, CNN, https://www.cnn.com/2014/11/20/us/fsu-incident/index.html

[49] See for example the June 16, 2020 Presidential Executive Order directing the U.S Attorney General to certify independent credentialing bodies that can assess agencies' policies in areas such as use of force, de-escalation, and identifying officers who may require intervention; and, the recently signed Massachusetts law (https://www.mass.gov/news/governor-baker-signs-police-reform-legislation) entitled *"An Act Relative to Justice, Equity and Accountability in Law Enforcement in the Commonwealth,"* which creates a mandatory certification process for police officers, increases accountability and transparency in law enforcement and gives police departments a greater ability to hire or promote only qualified applicants."

[50] See for example the International Association of Campus Law Enforcement Administrators' "Commitment to Higher Education, Campus Policing and Safety 2020 – 2021," which outlines initiatives to "cultivate…a community of trust and care," and advocating for the "use of globally recognized campus police and public safety policies, procedures, and standards."

> **"** The department also needs a well-designed communication strategy designed to educate and inform members of new policies or changes/revisions to existing policies.

During the process to update its policies, Public Safety leadership should coordinate the development of these policies with key partners and community members, as appropriate and in line with evolving transparency and accountability approaches.[51] The department also needs a well-designed communication strategy designed to educate and inform members of new policies or changes/revisions to existing policies.

Public Safety will need to commit significant resources to update these policies and build a transparent policy development process. We encourage BUPD leadership to seek the guidance and counsel from the large number of campus safety resources available in the Boston area to assist them with future policy development initiatives and to include the University's Policy Committee in this process.

Below, we highlight the following the widely accepted 6-Step Process for Policy Implementation:

1. Write policy

2. Train using the policy as basis

3. Provide positive supervision

4. Discipline and reinforcement

5. Review and revise policy

6. Provide legal updates, as needed

[51] Recommendations in the IACP's Community Participation and Leadership. Practices in Modern Policing. Alexandria, VA: International Association of Chiefs of Police (2018), encourage police agencies to: "Involve the community in the process of developing and evaluating policies and procedures."

Recommendations

4.1.1   Update all policies, at first focusing on the 12 high risk/liability policies[52], and then moving to the policies that support a 21st Century Policing approach, such as Bias-Free Policing, Procedural Justice, and others that we describe later in this report. Brandeis should consider an inclusive process for updating policies, with perhaps, the Campus Safety Committee assuming a central role in the policy review and updates.[53]

4.1.2   Following the update on the primary policies, immediately train and orient department members on important policy changes and formally adopt the uniformly accepted practice of immediately training and/or orienting officers to newly published policies.[54] The department should document this process.

4.1.3   Ensure relevant community input on BUPD policy development through the Campus Safety Committee and/or other formal policy review committee.

4.1.4   Working alongside on-going university efforts to address systemic racism, task the Campus Safety Committee with reviewing other University policies addressing or intersecting with the notion of "safety and wellness" and review these policies for evidence of on-going relevancy, implicit bias, and other dimensions that may contribute to systemic racism.

SUPPORTING THEME 4.2: DEVELOP AND IMPLEMENT A BIAS-FREE POLICING POLICY AND SUPPORTING PROCEDURES

Observations

As we addressed in the CONTEXT and NATIONAL DIALOGUE section of this report, the national climate regarding relationships between law enforcement agencies and communities of color and allies has raised important concerns about the fairness and equity of police practices and services. Brandeis University has directly experienced pressure from their community, as some students and other community members have called for disarming BUPD, greater transparency in policing policies, additional accountability and oversight, and more training in several areas.

The 21st Century Policing Task Force Report, created to identify ways to "strengthen community policing and trust among law enforcement officers and the communities they serve," following "a number of serious incidents between law enforcement and the communities they serve and protect"[55], including several high profile police killings of unarmed black people, is widely accepted as a blueprint for creating and maintaining equitable and unbiased policing. The Task Force Report identifies a number of best practices for realizing this goal. We reiterate that organizations such as the Movement for Black Lives and Campaign Zero have further demanded

[52]Successful Police Risk Management: A Guide for Police Executives, Risk Managers, Local Officials, and Defense Attorneys; G. Patrick Gallagher, Lulu Publishing Services, 2014

[53]At the writing of this interim update, the University has agreed to begin this process in earnest.

[54]Ibid, pg. 103.

[55]The President's Task Force on 21st Century Policing: Implementation Guide; pg. 1; Washington, DC: Office of Community Oriented Policing Services. Published 2015

wholescale policing reform through "limiting police interventions, improving community interactions, and ensuring accountability."

One important concept woven throughout the Task Force Report is the concept of Procedural Justice. Law enforcement organizations, including those charged with the safety, security, and law enforcement programs on college and university campuses, are beginning to "adopt procedural justice as the guiding principle for internal and external policies and practices to guide their interactions with the citizens they serve."[56] As noted throughout this report, we strongly recommend that Public Safety train all its members on procedural justice principles, and include it in every aspect of the department's mission, values, and operations.

> " we believe the department needs a comprehensive plan that weaves together the on-going work at Brandeis while responding to the national demands for transformation and is responsive to the demands outlined in the Black Action Plan.

We commend the University for the work being conducted by its office of Diversity, Equity & Inclusion (DEI) and the resources available on its webpage. We believe the office is a critical partner that Public Safety should continue to engage with to increase its competency in the areas of inclusion, diversity, and interacting with individuals from traditionally disenfranchised groups. As we acknowledge in other areas of this report, Public Safety has made some efforts towards building an enlightened team that understands and respects DEI goals; however, we believe the department needs a comprehensive plan that weaves together the on-going work at Brandeis while responding to the national demands for transformation and is responsive to the demands outlined in the Black Action Plan. We believe the strategic plan recommended in other sections of this report may be the appropriate document for the department to highlight its DEI goals, or this plan may exist as an appendix to the Plan. In either case, the plan and all related progress should be visible to the Brandeis community.

Recommendations

4.2.1   BUPD should continue to work with the office of Diversity, Equity & Inclusion and other University leadership to identify top priorities in the area of inclusion, diversity, and supporting and promoting the safety and wellness of diverse communities.

4.2.2   Public Safety, under the guidance of the Campus Safety Committee, should create a comprehensive strategic plan reflective of these priorities and the myriad of issues related to equitable and unbiased policing. A Bias Free policing policy is rapidly becoming the standard in policing. As a minimum, this plan should address the following elements:

[56]The President's Task Force on 21st Century Policing, 2015; Final Report of the President's Task Force on 21st Century Policing; Washington, DC: Office of Community Oriented Policing Services. Published 2015

- Bias-Based Policing Policy

- Training

- Leadership, Supervision and Accountability

- Recruitment, Selection, and Promotion

- Engagement with Traditionally Underrepresented Groups

- Department Diversity and Inclusion Priorities

- Data Collection, Measurement, Analysis

- Transparency

4.2.3 The Campus Safety Committee should include students, staff, and faculty in the Public Safety strategic planning process.

> **This support for enhanced security is due, in part, to concerns about the increased occurrences, nationally, of anti-Semitic hate crimes and bias incidents, and violent attacks on synagogues and Jewish gathering places, such as those tracked in the Anti-Defamation Leagues' "Audit of Anti-Semitic Incidents 2019."**

Initiatives and Formal Goals Related to Diversity, Inclusion and Equity

Observations

Several stakeholders shared with us their concerns about how race can play a role in the way police officers perform their duties and provide services to the community. We heard in Forums and interviews alike that Brandeis community members of color are distrustful of the police in general, and that this distrust extends to BUPD. Some expressed that they did not feel that BUPD officers treat all students the same. We refer to the confusion between DCL and BUPD regarding the legal issues surrounding access to students' rooms mentioned earlier in this report, as there is a belief that BUPD accesses rooms occupied by students of color more frequently than those rooms occupied by white students. The University should review the available data to confirm or deny this allegation.

Additionally, stakeholders shared their perceptions that social events organized by students of color appeared to require more police presence than other campus events. We note that this is a complaint we hear at virtually every institution where we are engaged. Students of color shared strong feelings that their functions are "over-policed." Though we found no formal complaints and/or other documentation

to support what we heard during our sessions, we believe these perspectives are pervasive enough that the University must develop, with input from students of color, a security staffing rubric for special events. The department does not currently have a policy or protocol addressing staffing for special events, though event planning staff and BUPD agreed that they work closely with students to ensure appropriate coverage. The mere lack of a policy is problematic on its face, given the amount of controversy surrounding these events. While we acknowledge the existence of protocols for student safety monitors at student events, and staffing protocols and practices for BUPD, the University should formalize these practices, with campus input, through policy. Once developed, this policy should be available to the community.

While some campus members, primarily students, expressed a desire to limit interactions with BUPD, others shared their support for a visible police presence and an increase in the physical security efforts such as cameras, access control, and campus entry screening. This support for enhanced security is due, in part, to concerns about the increased occurrences, nationally, of anti-Semitic hate crimes and bias incidents, and violent attacks on synagogues and Jewish gathering places, such as those tracked in the Anti-Defamation Leagues' "Audit of Anti-Semitic Incidents 2019." The University must consider the wide span of individual perspectives to develop initiatives and goals that balance these concerns. Ultimately, once University leadership decides on objectives, including those specific to BUPD, they must collectively support and clearly communicate them to the community.

It is especially important that the University continue the conversations begun during this review. We believe the University can best conduct this through facilitated dialogues between BUPD and representatives from the community to exchange thoughts and perceptions, to improve understanding, and to encourage ongoing communication. We believe the benefits to continuing these efforts remain fruitful.

An important goal for BUPD should be to develop, in partnership with Human Resources, a robust recruitment and selection program to attract, hire, and retain individuals best suited for campus safety service at Brandeis. In our opinion, campus safety and security is a specialized profession. BUPD should be intentional and judicious in their hiring and retention for all positions. Additionally, we heard concerns about the lack of diversity in Public Safety. Please see below the department's current demographic composition:

> " An important goal for BUPD should be to develop, in partnership with Human Resources, a robust recruitment and selection program to attract, hire, and retain individuals best suited for campus safety service at Brandeis.

DEMOGRAPHICS OF PUBLIC SAFETY EMPLOYEES BY COUNT (29 EMPLOYEES)

BY RACE/ETHNICITY						
	American Indian or Alaskan Native	Asian	Black or African American	Hispanic of any race	Two or more races	White
	0	1	2	2	0	24
BY GENDER						
	Male	Female	Other			
	24	5	0			
BY VETERAN STATUS						
	4					

DEMOGRAPHICS OF BUPD EMPLOYEES BY COUNT (22 EMPLOYEES)

BY RACE/ETHNICITY						
	American Indian or Alaskan Native	Asian	Black or African American	Hispanic of any race	Two or more races	White
Sworn officer	0	0	2	2	0	16
Non-sworn officer	0	1	0	0	0	1
BY GENDER						
	Male	Female	Other			
Sworn officer	17	3	0			
Non-Sworn officer	2	0	0			
BY VETERAN STATUS						
Sworn officer	2					
Non-Sworn officer	0					

We reviewed the available University data from the Brandeis Fall 2019 Faculty Fast Facts and 2020 Brandeis Factbook[57] for comparison and compiled the data in the following chart:

COMPARISON DEMOGRAPHICS BY PERCENTAGE

	FEMALE	ASIAN	BLACK OR AFRICAN AMERICAN	HISPANIC OF ANY RACE
BUPD	13.6	4.5	9.1	9.1
Faculty	45	9	3	4
Undergraduate Students	60	14.9	5.5	8.3

[57] https://www.brandeis.edu/about/facts/faculty.html; https://www.brandeis.edu/factbook/enrollment.html

There were no comparable data available for veteran students or faculty, or for non-academic staff. We assembled these data to give context to the diversity within BUPD. It bears mentioning that the diversity within BUPD, while perhaps not the levels desired, aligns with other Brandeis demographics, with the exception of the percentage of female sworn officers. For additional context, according to the 2018 FBI:UCR Crime in the United States Table 74, "Full-time Law Enforcement Employees by Population Group Percent Male and Female," women make up between 8.1% (Nonmetropolitan counties) and 15.5% (Cities of 250,000 to 499,999) of all law enforcement officers, with a national average of 12.6 percent for all agencies. We applaud the University's on-going commitment to diversity and recognize the difficulty of recruiting diverse candidates to the law enforcement profession, in particular. These points underscore both the opportunity for and importance of a collaborative, proactive effort among BUPD, ODEI, and HR.

Recommendations

4.2.4   Work with HR and the Office of Diversity, Equity & Inclusion to develop diversity hiring goals, noting the greatest need is for additional female officers.

Policies and Procedures to Ensure Alignment with Evolving Best and Promising Practices Regarding Unbiased Policing and Response to Bias Incidents

Observations

As noted before in this report, BUPD must update its policies. Furthermore, the department does not currently have any policies related directly to bias-free policing. While the University has policies against, and procedures to adjudicate discrimination and harassment, it has not developed protocols for responding to bias incidents. Current University guidance directs individuals to report incidents they believe are bias-related to either BUPD, Human Resources, the Office of Equal Opportunity, the Intercultural Center, the Gender and Sexuality Center, or the University Ombuds.

Given the strained relationship between some in the campus community and BUPD, this guidance fails to acknowledge that some campus members may be reluctant to report incidents to BUPD. We confirmed this potential underreporting through our interviews and forums, when participants cited bias-based incidents for which there are no formal reports in any the above named departments. Unreported incidents may contribute to a climate where some feel that the University is not fully committed to creating a safe and inclusive environment. We highly recommend that Brandeis consider implementing formal response protocols for bias-related incidents (for example, a violent crime motivated by animus towards a certain group, anti-LGBTQI graffiti, etc.) and establishing a Bias Incident Response Team to manage the University's response to reported incidents. Bias Incident Response Teams often include membership from the office that oversees diversity and inclusion initiatives, equal opportunity, student affairs/conduct, cultural centers, and others. We have included links to bias teams at other institutions.

The University should also establish protocols for tracking and monitoring bias incidents, as these incidents have the potential to create emotionally, physically, and psychological hostile climates for victims. Tracking bias incidents is important because research suggests that when minor acts of incivility and/or vandalism go consistently unaddressed, it creates a sense of shared apathy that lowers overall civility for an entire community. In short, when incidents consistently go unaddressed, it can give the impression that the campus is not safe.

Addressing bias/hate crimes through a formalized process will go a long way towards rebuilding trust between the University and historically underrepresented and marginalized communities. It can also provide Brandeis a benchmark for measuring campus climate and civility.

Bias incident response teams and protocols represent evolving practices for the following reasons:

- Colleges and universities are microcosms of the larger society and even municipal, federal and non-profit agencies (i.e. the Southern Poverty Center) track bias and hate crimes locally, regionally and nationally as a general measure of culture, climate and safety.

- Given that hate crimes are on a rise nationally, and institutional officials must be prepared to address both bias incidents that do not rise to the level of a crime, and actual hate crimes themselves.[58]

- Despite the stereotype that higher education is more liberal, colleges and universities are the 3rd most common location where bias/hate crimes occur.

- Data related to campus climate is essential information that can be used in strategically planning recruitment and retention efforts.

- Hate/bias crime can draw immediate attention to a campus from both internal and external community, as well as the media.

- Mishandling of a critical bias/hate crime incident can take years to recover from, i.e. University of Missouri.

Recommendations

4.2.5   Develop and implement policies governing equitable and unbiased policing practices, and establish clear expectations for adherence to them, including as part of the University's performance management program.

4.2.6   Consider establishing a bias incident response team and associated protocols. Institutions that have high performing teams include:

- [Emory University](#)
- [University of Vermont](#)
- [Wake Forest University](#)
- [Washington University in Saint Louis](#)

Data Collection & Measurement

Observations

There are multiple factors that impact the collection and measurement of police activity data. First and foremost, a department must rely on officer reporting for the initial data. For example, if a department were collecting data regarding how often an officer engages in foot patrol, they would rely on the officer to relay that activity to the dispatcher, who would then record it in a records management system. It is

[58] https://www.npr.org/2020/11/16/935439777/fbi-report-bias-motivated-killings-at-record-high-amid-nationwide-rise-in-hate-c

relatively easy to see that many variables could impact the accuracy of the data reported. We start with the assumption that, unless proven otherwise, officers are being forthright in all of their reporting, and further rely on the accuracy of what is recorded by the dispatcher (what did the dispatcher hear; did they enter it accurately into the system; were the times accurate). The Police Foundation's publication "5 Things You Need to Know about Analyzing Police Traffic Stop Data" shares the complications of analyzing traffic stop data.

These examples are illustrative of the complexity of collecting and then analyzing data that may be crucial to management decisions about unbiased policing. Modern technology provides us with a platform to verify the reliability of the information, as does appropriate oversight and supervision. The fact remains that the collection and measurement of this data is quite complex. Additionally, the data, despite common public misperceptions, does not tell the complete story regarding potentially bias-based practices. According to Fridell:

> "Such systems can absolutely measure "disparity." That is, for instance, a system can show whether people of color are stopped disproportionate to their representation in some comparison population—the "benchmark" population. What is much more challenging, is determining the causes or sources of that disparity. Some of that disparity may be produced by biased policing; some of that disparity may reflect other, legitimate, factors."[59]

This is not to suggest that collection and measurement cannot have a role in producing bias-free policing. Again, according to Fridell:

> "On the positive side, measurement systems can convey to the community a commitment to unbiased policing and, relatedly, a commitment to accountability and transparency. Such systems can provide the agency with information about what its personnel are doing (regardless of the race data)—answering such questions as: How many stops do we make and where? How many searches do we conduct and with what result? Data collection may deter biased policing as officers consider whom they are stopping and why."[60]

Given the significant costs associated with data collection and measurement, and the attendant complexity of both collection and analysis, the University must decide if the benefits of collecting, analyzing, and publicly disclosing this information outweigh the costs. BUPD does not currently capture any demographic data in their calls for service interactions; therefore, any endeavor to do so would involve building the policies, procedures, and protocols from the ground up, and ensuring that the necessary infrastructure in technology and personnel are in place to support the program.

[59] Fridell, Producing Bias Free Policing, pg. 66.

[60] Ibid, pg. 67.

As is the case at Brandeis, most campus safety departments do not have an internal capacity to appropriately analyze this type of data, though more departments are moving toward identifying a position to engage in this complex undertaking. We encourage the University to consider internal resources, such as the Office of Institutional Research, or other functions, that may be able to participate in a data identification collection and analysis initiative. Alternatively, or additionally, the University consider partnering with an academic department with the appropriate understanding and knowledge to analyze the data related to this area. This effort will likely require dedicated staff with the necessary expertise in the field of law enforcement as well as the analytical skills to parse the data effectively and often enough to be meaningful.

BUPD officers are responsible for initially gathering responding officer's activity through entries in the department's computer aided dispatch (CAD) records management system. This information includes calls for service and officer initiated activity, such as traffic or pedestrian stops. The data shared with us is voluminous and extensive. The BUPD CAD system, the Automated Records Management System or (ARMS) has the capability to generate various reports that record events associated with a particular CAD entry.

ARMS also appears to have the capability to record data for several management purposes, including managing staff deployments, identifying training needs, and collecting stop and contact data. At the time of our assessment, the lieutenant has the responsibility for the administration of ARMS. This position's breadth of responsibilities limits the time available to develop the necessary subject matter expertise to conduct an analysis of any the data that is currently collected. Further, BUPD has neither a plan for nor a policy governing the collection and measurement of the information.

Moving forward, Brandeis should reach consensus on whether or not it is committed to developing, implementing, and maintaining a data measurement initiative, recognizing that it is extremely difficult to measure the presence of bias policing at the organization and/or at the individual level. If the University decides to move forward, it must agree on shared goals for data measurement, and collectively establish protocols regarding how the analysis will occur and related accountability measures. Further, there should be agreement on the front-facing transparency strategy for sharing the data with the wider campus community. As noted above, data measurement is complex and can be resource intensive, so it is imperative that

> " Brandeis should reach consensus on whether or not it is committed to developing, implementing, and maintaining a data measurement initiative, recognizing that it is extremely difficult to measure the presence of bias policing at the organization and/or at the individual level.

there is consensus around goals, software systems, accountability systems, and policies.

Recommendations

4.2.7   Reach consensus on whether Brandeis will develop a program to collect this information given the complexity of the undertaking and in recognition of a cost/benefit analysis. It is our opinion that BUPD should continue this initiative, albeit, under precise guidelines.

4.2.8   Develop a written directive governing data collection and measurement and ensure accountability in each step of the process.

4.2.9   Ensure that Public Safety staff are trained in and understand the data collection program, and make policies, procedures, and reports available to the Brandeis community.

4.2.10 Create (minimally) a formal quarterly report of pertinent DPS metrics, based on consensus with the Campus Safety Committee.

4.2.11 Consider partnering with an academic department Brandeis, or with the Office of Institutional Research, to coordinate and manage the collection and analysis of the agreed upon data. The goal should be to identify and understand any racial and/or ethnic disparities that may exist in the data.

4.2.12 Consider whether a data manager/analyst position is important for the consistency and integrity of the overall data collection and transparency initiative.

SUPPORTING THEME 4.3: ENHANCE TRANSPARENCY OF TRAINING PROGRAMS

Observations

We were quite surprised to receive the amount of negative feedback we received regarding the perceived lack of appropriate training for Public Safety members. Aside from the feedback regarding differential response, this area generated most feedback. In general, campus community forum participants shared that they are under the impression that officers don't receive much training, and don't receive training in the appropriate areas, such as implicit bias, cultural competency, and de-escalation. Our review of the BUPD training program suggests this perception is incorrect. We were impressed with the depth and breadth of the training programs the department has offered over the past several years. These trainings include cultural competency spanning a wide range of diverse communities; trauma-informed responses; de-escalation, active violence response; and ASL orientation. While we will make recommendations for overall improvements to the training program, including strengthening record keeping and covering additional topics, such as procedural justice and customer service, we commend the Chief for being thoughtful about providing real time, meaningful training to the department.

It is obvious from the comments that we received that the department must do a better job around intentional transparency. The department's website does not provide any information on training, or address professional standards, with the exception of noting the authority under which officers exercise their law enforcement status. A visitor to the site would lead one to assume that the department does not have a comprehensive on-going training program. This is in stark contrast to the information provided on the BEMCO page of the site, where training, equipment, and other pertinent information is openly shared.

Recommendations

4.3.1   Provide more readily-available information to the community regarding BUPD's training program.

4.3.2   Formally designate a training coordinator.

4.3.3   Document all training in an appropriate records management system. ARMS includes a training module within its system.

SUPPORTING THEME 4.4: STAFFING CONSIDERATIONS TO SUPPORT RECOMMENDATIONS IN THIS REPORT

Observations

Though it was not within the scope of our assessment, we feel compelled to provide our observations regarding BUPD's current staffing rubric. We include in this section our recommendations for staffing to support BUPD operations and administration, in addition to suggesting staffing investments to create community service officer positions and a dispatch unit.

Several stakeholders shared their perspectives that the lieutenant's scope of responsibility appears very broad, and bordering on excessive. The department does not currently have appropriate staff to manage the day-to-day responsibilities normally assigned to such administrative and/or civilian positions. These include functions such as payroll, systems administration, Clery Act compliance, recordkeeping, training program management, timekeeping, and access control management. In lieu of staff to manage many of these responsibilities, they currently fall under the Lieutenant. These responsibilities are in addition to the more commonly assigned functions that a second- in-command would generally manage, such as complaint investigations, policy review and development, operations management, and strategic planning. Given this workload, we understand why the department has not completed a number of the more critical initiatives, such as updating policies, and communicating more effectively the departments training plan. The current situation is untenable.

In our opinion, the department has not created appropriate redundancy for the many functions that fall within the lieutenant's portfolio. For example, the lieutenant is currently the primary point of contact for members of the Information Technology Services department who support safety and security systems under Public Safety control. This is an important function within Public Safety and there does not appear to be another resource in the department who could manage these responsibilities should the lieutenant become unavailable for an extended time. It is critically important that BUPD identify another resource to create redundancy in this vital area. Looking forward, the new Public Safety leader should assess the lieutenant's role and responsibilities to ensure the workload is appropriate and consistent with the position within the organizational structure. We are aware that the University initiated a search to fill the second lieutenant's position, but did not move forward with the search. We support filling this position when the University selects the new Chief of Public Safety.

Campus safety departments should be organized to provide the resources and capabilities to internal and external customers. The executive, management, and administrative responsibilities are quite diverse, complex, and time consuming. Developing strategies for crime prevention and control, engaging the campus community in positive, collaborative interactions, and managing an institution's emergency management enterprise takes time, effort, collaboration, a high degree of sophistication, and an organizational structure that acknowledges the evolving complexities of campus safety and security, while simultaneously ensuring the right people and positions to carry out core functions.

Given the University's intention to adopt a differential response model, we examined staffing and the current structure to identify how the University might assign "alternative" resources for the many calls for service that do not require a sworn and armed officer response. Based on this analysis, we offer the following notional staffing table that we believe, based on our on-going work with Brandeis, would address workload, administration, and a first effort toward identifying differential response resources based on BUPD's current infrastructure.

BUPD STAFFING TABLE – RECOMMENDED POSITIONS

POSITION	ROLE	CURRENT	RECOMMENDED	DELTA
Leadership & Administration				
Chief of Public Safety	Leadership, Policy Development, Strategy	1	1	0
Assistant Chief/Director	Management, Policy Development, Professional Standards/ Systems Administration	1	1	0
Admin Compliance Officer	NIBRS Support, Clery Compliance	0	1	1
Business Manager	Finance, Payroll, Personnel	0	1	1
Data Analyst	Crime and Other Data Analysis	0	1	1
Community Engagement Sergeant	Crime Prevention, Community Engagement/ Policing	0	1	1
Detective Sergeants	Investigations	2	1	-1
Total Leadership/ Admin Sworn		**4**	**7**	**3**

PATROL OPERATIONS				
POSITION	ROLE	CURRENT	RECOMMENDED	DELTA
Lieutenant	Shift Command, Training Program, Professional Standards	1 (vacant)	1	0
Sergeant	Patrol Response/ Supervision, Fleet and Equipment Management	3	5	2
Patrol Officers	Patrol & Response	16 (3 vacant)	10	-6
Total Sworn Patrol Ops		**20**	**16**	**-4**
Security Operations				
Security/ Community Service/ Dispatch Officers	Physical Security, Community Service Response/ Dispatch Operations/ Records Management Support	2	10	8
Total Dispatch/Security		**2**	**10**	**8**
Administrative Support				
Records	Clerical Support/Records Management	0	1	1

TOTAL STAFFING RECOMMENDATIONS				
POSITION	NOTES	CURRENT	RECOMMENDED	DELTA
Leadership/Admin		4	7	3
Patrol Operations		20	16	-4
Security Operations	Consider changing position to Community Safety Coordinator	2	10	8
Admin Support		0	1	1
Total Staff		**26**	**34**	**8**

Clearly, the delta is significant. Based on our current understanding for the University's expectations for BUPD, we believe these numbers provide Brandeis a reasonable matrix on which to base staffing goals. We learned that some campus members continue to expect many of the non-emergency services currently provided by BUPD, including safety escort services, parking enforcement, and safety and security programming. We believe it will take some time for the University to identify these alternative resources, further justifying the staffing levels cited above.

The staffing levels recommended in this section are more likely to provide BUPD sufficient time to develop and maintain the skills necessary to meet contemporary standards and evolving complexities of campus safety demands, such as utilizing community service positions to provide non-police services, as well as providing the opportunity for officers to take earned time off to support officer wellness. The staffing also allows for moderate functional redundancy, eliminating the potential for a single point of failure should key personnel become unavailable.

Recommendations

4.4.1 Re-launch the search for the lieutenant's position as soon as possible after the new leader is hired.

4.4.2 Create a manager level position to oversee patrol operations. This position could also have additional administrative duties, such as managing the department training program, scheduling, performing professional standards investigations, and assisting with systems administration.

4.4.3 Create a community engagement coordinator. An ideal candidate for this position would be an individual with a community building, social justice, social work, or like background. In our opinion, this should be non-uniformed civilian position. It is not our intention that this position performs all the engagement activities; rather, the individual would build the program, train officers, liaise with student and other groups, and otherwise manage the engagement initiative.

4.4.4 Hire, or identify an existing University position, a civilian to perform business management duties such as finance, payroll, HR liaison, and scheduling.

4.4.5 Hire or identify an existing University position to perform BUPD and Clery Act compliance functions.

4.4.6   Hire a records clerk to manage records and support the day-to-day clerical needs of the department.

4.4.7   Reassign one detective sergeant back to patrol operations. In our view, the investigative workload does not justify 2 FTE positions.

4.4.8   Create a data analyst position to collect, analyze and create reports for crime data, community surveys, calls for service, demographic data, and other metrics, as identified by the Campus Safety Committee.

4.4.9   Promote or hire two additional sergeants to ensure patrol operations has 24/7 coverage. It generally takes 6 FTE individuals to cover a 24/7 assignment. Consider additional duties, as the workload permits.

4.4.10   Through attrition or promotion, reduce sworn officers from 16 to 10 officers.

4.4.11   Hire 8 additional security officers/community service coordinators, and cross train them for the dispatch function. This number will allow for at least two security officers on duty at all times, with one performing the dispatch function. Additional security officers would provide alternate response capabilities.

Section V

Attachments

Attachment 1: Forum Interview Summary

I. Total Days of Virtual Forums: Virtual forums held over a series of 11 days between the dates of October 26 – December 7, 2020

II. Total Number of Individuals in Attendance at Virtual Forums: Approximately 250

III. Total Number of Forums Conducted: 19

IV. Functional Areas Represented in Interviews:

- Academic Leadership
- Board of Trustees
- Campus Safety Committee
- City of Waltham Leadership
- Chief of Public Safety Search Committee
- Faculty & Faculty Senate
- Finance & Administration
- President's Direct Reports
- Public Safety
- Public Safety Campus Partners
- Staff Advisory Committee
- Student Groups

Attachment 2: PSMS Interview Summary

I. **Total Days of Virtual Meetings:** Virtual meetings held over a series of 10 days between the dates of:

- November 5-6, 2020

- November 9-13, 2020

- November 16-18, 2020

II. **Total Number of Interviews Conducted:** 25

III. **Number of Individuals Interviewed:** 42

IV. **Functional Areas Represented in Interviews:**

- Administration

- Athletics

- Communications & External Affairs

- Conference and Events Services

- Emergency Medical Executive Board

- Human Resources

- IT Planning & Operations (Information Technology Services)

- Office of Diversity, Equity, & Inclusion

- Office of the General Counsel

- Operations and Maintenance (Facilities Services)

- Public Safety

- Spiritual Life

- Student Affairs

Attachment 3: Re-Imagining Campus Safety Project Summaries

MARGOLIS HEALY AND ASSOCIATES

– Brandeis University

This project was undertaken in partnership with Dr. Brenda J. Bond-Fortier in three interconnected phases. Phase I of this project, led by Dr. Brenda Bond-Fortier, encompassed campus community outreach and structured, facilitated discussions with a wide range of stakeholders at Brandeis University. Margolis Healy provided skilled facilitators, Christi Hurt and D.A. Graham, to assist Dr. Bond with gathering information related to how stakeholder groups experience "safety and security" at Brandeis University. During Phase II of this project, Margolis Healy used its proprietary Public Safety Management Study® (PSMS) methodology to analyze current Brandeis University Department of Public Safety and other University-wide campus safety-related strategies, approaches and practices to ensure that the tenants of unbiased and respectful policing are embedded into the University's practices. This assessment examined the extent to which the Department's culture and operations are responsive to campus community expectations, concerns, and the national dialogue regarding police reform. In Phase III, Margolis Healy and Dr. Bond-Fortier produced a report that describes a comprehensive framework for campus safety at Brandeis University.

– University of Illinois-Chicago

Margolis Healy assessed the placement of various units within the University of Illinois – Chicago's Office of the Vice Chancellor for Administrative Services (VCAS) divisional hierarchy to ensure the structure is optimized for efficiency and effectiveness. These units included the University of Illinois at Chicago Police Department, Office of Preparedness and Response, Environmental Health and Safety, Parking Services, Transportation. Margolis Healy synthesized the data gathered and formulate an analysis that drew from reasonable, acceptable, best, and promising practices in campus safety, security, and law enforcement. We reviewed current duties and responsibilities of each unit, and present alternative alignment for efficiency among the units.

– **University of Arizona**

Margolis Healy conducted a comprehensive review of the University's and the University of Arizona Police Department's (UAPD) policies and practices to ensure the University is providing unbiased, equitable, inclusive, accountable, and transparent campus safety, security, and law enforcement services. This project was a two-phased approach, with each phase supporting the other and providing additional context for the framework for reimagining campus safety at the University of Arizona. In Phase I, Margolis Healy facilitated a series of focus groups and small group interviews to gather input from diverse constituents, including students of color, other student organizations, faculty, UAPD members, and other community members and stakeholders to gather input from these campus constituents in order to learn about current perceptions and needs regarding campus and community safety. In Phase II, Margolis Healy conducted a Public Safety Management Study® (PSMS®), which was comprehensive review of the management and operational functions of the University Police Department. Margolis Healy analyzed current University and UAPD strategies, approaches and practices to ensure that the tenets of unbiased and respectful policing are imbedded into the University and Department's operations and are responsive to campus community expectations and the national dialogue regarding policing reform.

– **Brown University**

Margolis Healy conducted a Public Safety Management Study™ (PSMS™), which is a comprehensive review of the management and operational functions of a campus safety department. The assessment included research, document review, interviews, verification, and analysis to become familiar with the organization's mission and role, orientation and strategy, operations, policies, practices, and related functions. The process involved rigorous inquiry with internal and external stakeholders intended to elicit facts, opinions, and perceptions about the Department's operations, including the tenor of relationships with the campus community; and how related policies, procedures, and practices align with contemporary standards and evolving, promising practices.

– **Skidmore College**

Margolis Healy is performing a comprehensive review of the College's and the Department of Campus Safety's policies and practices to ensure the College is providing unbiased, equitable, inclusive, accountable, and transparent campus safety, security, and law enforcement services. The project contains two phases, with each phase supporting the other and providing additional context for the framework for reimagining campus safety at Skidmore College. Through a focused Public Safety Management Study® (PSMS®), Margolis Healy is analyzing current College and Campus Safety policies, strategies, approaches and practices to ensure that the tenets of unbiased and respectful campus safety are imbedded into the College and Department's operations and are responsive to campus community expectations and the national dialogue regarding policing reform. As part of Phase II of the project, Margolis Healy is facilitating a series of focus groups and small group interviews to gather input from diverse constituents, including students of color, other student organizations, faculty, Department of Campus Safety members, and other community members and stakeholders in order to learn about current perceptions and needs regarding campus and community safety.

– **Illinois State University**

Margolis Healy is conducting a comprehensive review of the University's and the ISU's policies and practices to ensure the University is providing unbiased, equitable, inclusive, accountable, and transparent campus safety, security, and police services. This project was a two-phased approach, with each phase supporting the other and providing additional context for the framework for reimagining campus safety at Illinois State University. In Phase I, Margolis Healy is facilitating a series of listening sessions and small group interviews to gather input from diverse constituents, including students of color, other student organizations, faculty, ISU members, and other community members and stakeholders to gather input from these campus constituents in order to learn about current perceptions and needs regarding campus and community safety. In Phase II, Margolis Healy is conducting a Public Safety Management Study® (PSMS®), which was comprehensive review of the management and operational functions of the University Police Department. Margolis Healy will analyze current University and ISUPD strategies, approaches and practices to ensure that the tenets of unbiased and respectful policing are imbedded into the University and Department's operations and are responsive to campus community expectations and the national dialogue regarding policing reform.

– **University of Mississippi**

Margolis Healy is conducting a Public Safety Management Study™ (PSMS™) including research, document review, interviews, verification, and analysis to become familiar with the University of Mississippi Police Department's orientation, strategy, operations, policies, practices, and related functions in the areas identified below and in light of campus expectations and contemporary practices in campus safety and security. The process involves rigorous inquiry with internal and external stakeholders intended to elicit facts, opinions, and perceptions about UPD's operations, including the tenor of relationships with the campus community and how related policies, procedures, and practices align with contemporary standards and evolving, promising practices.

Brenda Bond-Fortier

– **Harvard University:**

full report available here: https://evp.harvard.edu/files/evp2/files/hupdreportdecember2020.pdf

– **Brandeis University:**

In Association with Margolis Healy

– **Drexel University**

The assessment is looking at the how students, faculty, and professional staff have interacted with Drexel police; under what circumstances our police officers consider the use of force; and how the Drexel Police Department interacts with Philadelphia police. Additionally, they also are looking at the budget that supports the Drexel Police Department to ensure it is appropriate and that those functions beyond public safety — particularly relating to mental health supports and other preventive services for campus and community — are positioned and fully funded. Drexel is taking on this independent review is to address any potential problematic behaviors and practices, and ultimately strengthen the Drexel Police Department.

Attachment 4: High Risk Police Operations[61]

- The use of force

- Vehicle and foot pursuits

- Emergency operations of police vehicles

- Search and seizure and arrest

- Care, custody, restraints and transportation of detainees

- Domestic violence, to include agency personnel

- Officer off-duty conduct and limits of authority

- Sexual harassment and sexual misconduct of officers

- Selection, appointment, and failure to terminate

- Complaint process and Internal Affairs

- Special operations, narcotics unit, high risk warrants and undercover assignments

- Responding to situations involving an individual experiencing a mental health crisis

[61]Gallagher, G. Patrick, *Successful Police Risk Management: A Guide for Police Executives, Risk Managers, Local Officials and Defense Attorneys, 53*

Attachment 5: Margolis Healy Team Members

STEVEN J. HEALY | CHIEF EXECUTIVE OFFICER

Steven J. Healy is the co-founder and Chief Executive Officer of Margolis Healy. Steven is a nationally recognized expert on campus safety, the Clery Act and Title IX. From an academic and research perspective, Steven is keenly interested in how and schools and colleges resource and support safety and security initiatives and how campus safety department adopt strategies for engaging with members of their campus communities.

He has served as a subject-matter expert for the U.S. Departments of Education and Justice. He testified before the U.S. Senate Committee on Homeland Security and Governmental Affairs on the topic of "Security on America's Campuses" and to the U.S. House of Representatives Committee on Education and Labor on the topic of "Best Practices for Keeping America's Campuses Safe." At the request of the U.S. Department of Education, he was asked to serve on a special working group developing emergency management planning guidelines for the higher education community.

Mr. Healy has been a featured presenter at several ACE Annual Meetings, addressing various issues related to campus safety, security, emergency management, and regulatory compliance. He served as chairperson of the National Center for Campus Public Safety Advisory Board and was responsible for leading the development of a strategic plan and framework for the National Center for Campus Public Safety. Steven also chaired the Advisory Board for the National Center for Campus Public Safety, which was funded by Congress in 2013.

He is a frequently requested and nationally recognized consultant, presenter, and trainer who speaks on issues related to campus safety and security. He has appeared on numerous national news programs and talk shows including CNN, ABC Nightly News, CBS, FOX, MSNBC, and National Public Radio. Steven was named one of the "Top 25 Most Influential People in the Security Industry" by Security Magazine.

From 2003 through 2009, he was the Director of Public Safety and Chief of Police at Princeton University where he led the University's safety, security, and law enforcement programs and is credited with enhancing and expanding the department's overall professionalism and capabilities through improved leadership, additional personnel, significant strategic investments in training, updated equipment, new computer systems and a relocation to a technologically advanced facility. Before Princeton, Steven was the Chief of Police at Wellesley College in Wellesley, MA. He also served as Director of Operations at the Department of Public Safety at Syracuse University for five years.

A past president of the International Association of Campus Law Enforcement Administrators (IACLEA (2006 – 2007)), Steven served as a member of the association's Government Relations Committee for 13 years and was the IACLEA Regional Director for the North Atlantic Region during his tenure at Wellesley. As president of IACLEA, Steven contributed significantly to the national dialogue about campus safety and security in the aftermath of the tragic rampage-shooting incident at Virginia Tech University in April 2007. As the Immediate Past President of IACLEA, Steven led an IACLEA special panel reviewing post-Virginia Tech challenges and concerns for the higher education community. He also served as IACLEA's representative to the National Association of College and University Business Officers (NACUBO) "National Campus Safety and Security Project" and to EDUCAUSE's "The IT Role in Campus Safety" project. He was a featured speaker and panelist with Dr. Gary Margolis, co-founder of Margolis Healy, on emergency response and recovery at the NACUBO annual meeting. In 2009, he was named a Fellow at the Department of Education's Higher Education Center for Alcohol, Other Drug Abuse and Violence Prevention. Steven is also a past president of the Massachusetts Association of Campus Law Enforcement Administrators.

Steven Healy is a 1984 graduate of the United States Air Force Academy. He spent 10 years on active duty with the United States Air Force as Security Police Officer. From 1992 to 1995, He was the Operations Officer for the 95th Security Police Squadron at Edwards Air Force Base.

CHRISTI HURT, M.P.A | VICE PRESIDENT FOR STRATEGIC INITIATIVES

Christi Hurt serves as the Vice President for Strategic Initiatives at Margolis Healy. Prior to assuming this role, she served in a number of leadership capacities at the University of North Carolina at Chapel Hill, including the Interim Vice Chancellor for Student Affairs, the Assistant Vice Chancellor/Chief of Staff for Student Affairs, the Interim Title IX Coordinator, and the Director of the Carolina Women's Center.

Christi has a depth of experience in building pan-university efforts to foster student success, ensure campus safety, and promote equity and access for all students. Additionally, Christi brings more than 20 years of experience working on local, state, and national levels to eliminate interpersonal violence and develop responsive support systems. She in a national trainer on building comprehensive solutions to prevent and address sexual violence, including childhood sexual abuse. Christi also supports nonprofit and higher education institutions as they work to build their strategic plans, organizational capacity, and succession planning. She frequently works with institutions during periods of significant transition to help ensure their growth and success over time.

She served as the Member Services Director, Associate Director, and Interim Director of the Washington Coalition of Sexual Assault Programs and worked with the National Sexual Assault Coalition Resource Sharing Project. She started her work to end violence in 1991, when she began working as a crisis line volunteer at the Orange County Rape Crisis Center in Chapel Hill, North Carolina. Christi earned her Master in Public Administration and her undergraduate degree from UNC, and is slated to complete her Doctorate in Public Health at UNC in 2021.

Christi serves as an adjunct faculty member at UNC in the School of Government, where she teaches courses on nonprofit management and nonprofit/government relationships.

KATHY ZONER | DIRECTOR OF ORGANIZATIONAL ASSESSMENT SERVICES

Kathy Zoner is the Director of Organizational Assessments where she assists clients with a range of specialized services, including Public Safety Management Studies™, physical security, community engagement, cultural awareness, event and emergency management, sexual assault prevention, mental health awareness, and behavioral and threat assessments.

Kathy joined the Margolis Healy team in March 2019. She has 27 years of experience in higher education law enforcement, including nearly a decade as the chief of the Cornell University Police after ascending through the ranks therein.

She was instrumental in guiding her prior agency into achieving and maintaining IACLEA accreditation, and was awarded the Michael Padula Award by the Tompkins County Human Rights Commission for her efforts in collaborations within the Cornell and Ithaca, NY, law enforcement communities. She was recognized by special legislative resolutions in both county and higher ed. institutional governance for her consistent work in creating law enforcement agencies that are accessible to the communities they serve, while creating environments of safety and mutual respect. She has distinguished herself on many local boards, community committees, and campus diversity initiatives, and facilitated numerous forums on police and community relations.

In 2014 in Washington D.C., she provided testimony before the senate subcommittee on Crime and Terrorism about the roles and responsibilities of law enforcement regarding campus sexual assault investigations. She has presented on issues pertinent to law enforcement at conferences, including the National Association of Student Personnel Administrators (NASPA) and the National Association of Attorneys General (NAAG).

Kathy is a founding member (2001) of her former institution's committee on student behavioral assessment, and served over ten years on their Threat Assessment Team. She presented for the New York State Committee on Counter Terrorism and remains active with her zone counter terrorism subcommittee.

She is a graduate of the Ohio State University and the FBI National Academy. She is certified in multiple FEMA incident command courses, including several on Incident Command for Executives and Senior Officials. Kathy is a current member of the FBI National Academy Associates, the International Association of Campus Law Enforcement Administrators (IACLEA), the International Association of Chiefs of Police (IACP), the National Association of Women Law Enforcement Executives (NAWLEE), and several New York state and local law enforcement associations. She chairs the Tompkins Cortland Law Enforcement Administrators Group, served as an IACLEA Accreditation Commissioner for nine years, and currently serves as chair of the IACLEA Communications Committee since 2016.

ROBERT L. EVANS | MANAGER FOR ORGANIZATIONAL ASSESSMENT AND DIRECTOR OF K-12 SERVICES

Rob Evans joined Margolis Healy as the Manager of Organizational Assessments and K-12 Services in April 2014. He specializes in campus safety, security and emergency preparedness for colleges, universities, and K-12 schools. Rob's executive law enforcement and military experience provides a unique background to offer clients a wide range of specialized services that includes arming studies, Public Safety Management Studies™, emergency management consultation, Immediate Action Response Training (IART), implementation of less lethal and lethal force options, litigation consultation and special investigations/ independent reviews. Rob has worked with college and university public safety agencies across the country to enhance the safety and security services they provide to their campus communities.

Rob also serves as the state of Vermont's School Safety Liaison Officer, where he reports directly to the Secretary of Education and the Commissioner of the Department of Public Safety. In this capacity, Rob is responsible for coordinating school crisis preparedness and planning for over 300 public, private and independent schools. Working with local, county and state level school safety partners, Rob has enhanced the state's "all hazards" approach to school emergency preparedness and has coordinated the development and delivery of school executive leadership training in the areas of active shooter response, individual and organizational response to a critical incident, prevention of violence and de-escalation training, incident command training, behavioral threat assessment and crisis communication. In August of 2018, Rob was appointed by Governor Phil Scott to serve on the state's Community Violence Prevention Task Force, where he serves as the Chairperson for the Task Force's prevention subcommittee.

In March 2013, Rob retired from the Vermont State Police after serving 23 years in a variety of operational, training, homeland security and executive leadership positions within the organization. For 19 years, he was a member of the State Police SWAT team where he was an entry team member, sniper, breacher, active shooter

instructor and team commander. Rob has extensive experience commanding hundreds of critical incidents throughout the state and has instructed local, county and state law enforcement officers in the areas of critical incident response and tactical command planning and management. Rob also spearheaded Vermont's law enforcement deployment in support of the recovery operations after Hurricane Katrina (Gulfport, MS) and Tropical Storm Irene (coastal New Jersey).

In his last role as the Assistant Field Force Commander, Rob was the single Vermont State Police point of contact for all major events requiring special security operations. He had operational control of nine special response teams including SWAT, SCUBA, bomb squad, crisis negotiators, K-9 units, Clandestine Lab Response Team, search and rescue, crash reconstruction and the critical incident dispatch team. Rob has conducted pre-operational planning and implemented security operations for Presidential visits, border security operations, marine and air operations, tactical and immediate action support, intelligence gathering, threat assessment and command and control operations. In 2006, Rob led the tactical entry team that entered the building in response to an active shooter at the Essex (VT) Elementary School.

He was the statewide law enforcement coordinator for VT Emergency Management responsible for directing law enforcement and security operations during manmade or natural disasters. He has collaborated with Vermont's Agencies of Transportation and Natural Resources, the Departments of Health, Public Safety, American Red Cross and the Vermont National Guard to develop security action plans for implementation during statewide emergencies and critical incidents.

Rob is a distinguished military graduate from Ferrum College and is a George C. Marshal Award winner for outstanding leadership. Rob's tactical career began with the US Army as an Airborne Ranger assigned as a Scout Platoon Leader with the 4th Infantry Division. He is a graduate of the FBI National Academy, attended the U.S. Secret Service's Managing Large-Scale Security Events Course, is a member of the International Association of Chiefs of Police (IACP) Patrol and Tactical Operations sub-committee, and is a member of the National Tactical Officers Association.

D.A GRAHAM, PH.D. | SENIOR ASSOCIATE

Dr. Graham is currently The University of Kansas Ombudsperson. He is the former Vice President, Global Integrity Leader at Nielsen in NYC; University Ombudsperson for Princeton University, San Diego State University and Former Director of Human Resources at The University of the Sciences in Philadelphia.

Dr. Graham has more than 20 years of experience as a Master Facilitator and Mediator in the resolution of complaints, appeals and internal grievance processes for employee/employer issues. He has worked to resolve issues between parties through various types of mediation and communication

processes. He has designed and taught numerous courses and workshops on communication, conflict engagement skills, diversity and accountability at multiple universities, corporate and nonprofit organizations.

Dr. Graham is a Certified Trainer, a Lecturer and Conflict Coach.

JOHN KING JR. | SENIOR ASSOCIATE

John M. King has worked in the field of collegiate law enforcement and public safety for over 44years, having previously served as the Executive Director of Public Safety and Chief of Police at Boston College(ret), Senior Director of Public Safety at Tufts University, Director of Public Safety at Bentley University, and held command positions with the Northeastern University Police Department. Throughout his career, he has provided executive leadership to these public safety organizations which were responsible for Policing and Security, Emergency Management, Environmental Health and Safety, and Emergency Medical Services. The primary objectives of these organizations were the development of strong community partnerships, maintaining a high level of professional standards improving security technology and implementing programs and practices to contribute to the safety of these campus communities.

Under John's leadership, The Boston College and Tufts University Police Departments were accredited by the Massachusetts Police Accreditation Commission. Mr. King earned a BS in Law Enforcement and a Master's Degree in Public Administration from Northeastern University, and a graduate certificate in Emergency Planning and Management from Boston University. He has earned professional certifications as a Certified Sports Security Professional from the National Center for Sports Safety and Security and as a Certified Protection Professional from ASIS International. He served as an adjunct faculty member at Northeastern University and has been an invited speaker to groups of student affairs professionals, risk managers and campus public safety directors.

He is a graduate of the Boston Police Academy. Mr. King is a Past-President of the International Association of Campus Law Enforcement Administrators (IACLEA), a Past-President of the Massachusetts Association of Campus Law Enforcement Administrators (MACLEA) and held numerous board and committee positions with both of these organizations. He served as a Commissioner and Secretary for the Massachusetts Police Accreditation Commission.

ANTHONY CAMPBELL | ASSOCIATE

Born in Harlem, New York, Anthony Campbell attended the prominent Fordham Preparatory High School where he graduated as the Valedictorian of his class. Later moving to New Haven, he would attend Yale University where he made the decision to change his Electrical Engineering major to Religious Studies, with an emphasis on counseling and psychology. Chief Campbell received his undergraduate degree from Yale University in 1995 and he would eventually receive his Masters of Divinity Degree from the Yale Divinity School in 2009.

In March of 2019, Anthony retired from the New Haven Police Department (NHPD), where he served since 1998, rising through the ranks to become Chief in 2016. Anthony Campbell joined Yale as an Assistant Chief of Police overseeing Patrol Operations, Community Engagement and Emergency Services, effective June 10, 2019.

During his tenure as NHPD Chief, New Haven experienced record-setting levels of crime reduction, allowing for an additional focus on improving the quality of life for residents, students, and visitors in New Haven. Anthony served in a variety of roles while at NHPD; specifically Patrol Supervisor, Detail Room Supervisor, Academy Director, Officer in Charge of Internal Affairs, and Chief of Staff. In 2014, to renew the NHPD's focus on Community-Based Policing. Anthony was promoted to the rank of Assistant Chief, first serving as Chief of Administration, and later as Chief of Operations (Patrol).

In addition to his law enforcement background, Anthony has demonstrated strength as a relationship builder, successfully identifying and developing collaborative efforts that have addressed both criminal behavior and its root causes. He is a committed servant leader, developing the personal and professional strengths of officers through quality training, emerging law enforcement technology, and opportunities for advancement.

In addition to holding both a bachelor's and master's degree from Yale University, Anthony has trained in counter-terrorism and law enforcement management. He has also worked closely with government and private entities including Project Longevity, Yale Child Study, and Collaborative Response to the Opioid Crisis. Outside of work, Anthony is married to his college sweetheart, Stephanie, and they have three sons. He enjoys Sci-Fi and superhero movies and working with 4-year-olds in the preschool ministry at church.

IN ASSOCIATION WITH:

BRENDA J. BOND, PH.D. | PROFESSOR OF PUBLIC ADMINISTRATION, INSTITUTE FOR PUBLIC SERVICE, SUFFOLK UNIVERSITY

Brenda J. Bond-Fortier, PhD is Professor of Public Administration in the Institute for Public Service at Suffolk University. Dr. Bond-Fortier specializes in organizational change in criminal justice, systematic and collaborative approaches to organizational and community challenges, and the development, implementation, and evaluation of public safety policies and practices. Her book, Organizational Change in an Urban Police Department: Innovating to Reform (2020) analyzes changes in policy, practice and community relationships to understand innovation and organizational transformation in policing. She has conducted research across the United States, published her work in prestigious journals, and been cited in major media outlets. Bond-Fortier is a nationally respected and recognized policing scholar who is valued by practitioners and policymakers for her participation and contributions to police practice and management. She serves as a Subject Matter Expert for the US Department of Justice's Bureau of Justice Assistance Strategies for Policing Innovation initiative, and is a Senior Research Fellow for the National Police Foundation. She previously served as a Research Associate at Harvard's Kennedy School of Government Program in Criminal Justice Policy & Management, as Research Advisor for the Northeastern Massachusetts Law Enforcement Council, and as Director of Research and Development at the Lowell, Massachusetts Police Department.

Dr. Bond-Fortier received her Ph.D. and MA in Social Policy from the Heller School for Social Policy and Management at Brandeis University, a Master of Arts in Community Social Psychology and a Bachelor of Science in Criminal Justice from University of Massachusetts Lowell.

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