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#### November 1, 2021

Dear ISU Community,

The Illinois State University Police Department's (ISUPD) mission is to serve, protect, and educate with PRIDE and in partnership with our community. In that spirit, earlier this year, the University retained Margolis Healy and Associates to conduct a two-phased Campus Police Study and Departmental Review. This work was prompted by recommendations from student activists, "Anti-Black ISU (ABISU)," who expressed their concerns regarding policing practices on our campus specific to African American students. As a result of our students' request, as well as our genuine desire to ensure the equitable and just treatment of all those whom ISUPD serves, this external review of ISUPD policies and practices ensued in the spring of 2021.

This external review by Margolis Healy and Associates consisted of an assessment of the University Police Department's operations and approach in addition to a series of key stakeholder interviews with students, faculty, and staff. Additionally, community listening sessions were organized to gather feedback about current perceptions and needs regarding campus and community safety. Students who participated in these sessions were free to share their experiences and perceptions on any topic they chose. While all students were invited to participate, we extended special invitations to student groups representing marginalized identities.

The results of this rigorous and comprehensive review affirmed that the processes and operations of ISUPD are conducted in an appropriate manner, adhere to legal and industry best practices, and in many cases, provide innovative solutions to campus safety issues. However, the report also acknowledges that there are opportunities for improvement. We recognize that additional systemic barriers within our campus policing practices may impact minoritized populations on our campus, and that students may be having such experiences- either on our campus or within the broader Bloomington-Normal community. As such, we will continue to address these issues and rectify concerns through the ISU Police Advisory Committee, with the advisement of the President's Diversity and Inclusion Advisory Council and discussions with students and student organizations.

Within the enclosed report there are 67 recommendations that cover a number of important areas, including transparency and accountability, staffing, training, policies, and partnerships. Work on these recommendations has already begun, and we look forward to collaborating with our community to accomplish these goals in the months ahead.

Consistent with our commitment to openness and transparency, we present the full and unabridged report. We encourage our campus community to read it thoroughly and share their thoughts and insights through our planned open forums or via email at StudentAffairs@IllinoisState.edu.

Sincerely,

Illinois State University Police Department



## ILLINOIS STATE UNIVERSITY Illinois' first public university

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CAMPUS POLICE STUDY AND DEPARTMENTAL REVIEW

August 2021



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## INTRODUCTION AND PROJECT SCOPE

Illinois State University's (ISU or the University) mission states, "We at Illinois State University work as a diverse community of scholars with a commitment of fostering a small-college atmosphere with large-university opportunities. We promote the highest academic standards in teaching, scholarship, public service and the connections we build among them. We devote all of our resources and energies to creating the most supportive and productive community possible to serve the citizens of Illinois and beyond."

In support of this mission, the University retained Margolis Healy and Associates, LLC (Margolis Healy or MHA), to conduct a two-phased Campus Police Study and Departmental Review. Phase I of this assessment consisted of a series of key stakeholder interviews and community listening sessions to gather input about current perceptions and needs regarding campus and community safety. During Phase II, we assessed the University Police Department (ISUPD) operations, approach, and policies through research and extensive interviews with ISUPD members, campus partners, other key stakeholders, and external agencies with whom ISUPD works.

## ORGANIZATION OF THIS REPORT

We present this report in a chapter format with several major parts. Section I includes the methodology for this study, 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 outlines our *General Observations* and *Major Themes* identified during our assessment. Section IV addresses *Specific Observations* and recommendations from the primary focus areas. Section V states the recommendations, in a master list. Finally, section VI contains the various attachments to this report.

### ACKNOWLEDGMENTS

We acknowledge the assistance and guidance of Vice President of Student Affairs, Dr. Levester (LJ) Johnson, and Chief Aaron Woodruff, who served as our primary liaisons for this project. We also appreciate the assistance of Ms. Laura Fox, Budget Manager at the police department, who served as our logistics liaison. We extend appreciation to members of the Illinois State University administration, faculty, staff, students, and members of the Illinois State University Police Department, who were instrumental in providing appropriate context and historical information about the University and their perceptions of campus safety and security. Participants were welcoming and forthcoming in their opinions about the matters at hand.

## DISCLAIMER AND DISCLOSURE

Margolis Healy and Associates, LLC, conducted this assessment and prepared this report at the request of the Illinois State University. We provide our opinions, findings, conclusions, and recommendations solely for the use and benefit of the University 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 assessment and presentation. Our recommendations might be subject to change in light of changes in such data.

## SECTION I – METHODOLOGY

Margolis Healy and Associates, LLC, conducted this assessment by becoming familiar with the University, its culture, context, and physical environment, along with the unique safety and security challenges it faces. In addition to conducting the focus groups discussed above, we examined the Police Department's mission, role, operational strategy, accountability, transparency, police oversight, community policing and community engagement, training and professional development and equitable and unbiased campus safety services, and the department's mission, role, and strategy and their alignment with the University's mission. Our assessment of these areas should provide a reasonable foundation from which to make key decisions ranging from its mission, role, and strategy, training, crime prevention programming and community engagement and resource allocation.

This report serves three general purposes. First, we organize the observations and recommendations to provide the University with an objective assessment of the current state of campus safety, security, and police operations and related campus security practices and protocols. Second, leadership can use the observations to understand specific areas of risk they should address to continue to provide a reasonably safe campus environment. Finally, this report can provide institutional leadership with an understanding of the orientation and functional success of the University's safety and security initiatives and opportunities for improvement.

The team was co-led by MHA team members Kathy Zoner and Rob Evans. The team conducted its remote focus group and virtual site visit from February 25th, 2021 to April 5th, 2021. For additional information regarding the Margolis Healy team that conducted this assessment, please refer to Attachment II.

Due to the nation's response to the COVID-19 pandemic, all of our assessment work, interviews and forums were conducted virtually with University staff identified by the University. Our meetings included a mix of one-on-one and small group interviews.

To identify the major themes for this review, we cross-referenced information from the one-on-one and small group interviews with concerns we identified during our assessment of policies, procedures, and operational 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 a concern that the team had independently identified. Because we assessed ISU's current state of security and campus safety 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 lack of clarity of the department's internal affairs process, we noted it as an area requiring clarification. We then conducted additional verification to understand the Department's internal affairs policies and practices and reached consensus on whether the issue rose to the level of a significant challenge. Because we received feedback from multiple constituent groups in several different venues, 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 campus security landscape.

## SECTION II – THE NATIONAL DIALOGUE ON POLICE REFORM

Protest 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, having swelled periodically in the past half century in the form of protests against police practices in 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.<sup>1</sup> Behind these episodic protests, however, lies ongoing frustration about police practices and behavior and, ultimately, the role of police in society.<sup>2</sup> 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 upwelling of concern reveal that American policing faces 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."<sup>3</sup> 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.<sup>4</sup> Increasingly, public opinion favors change.<sup>5</sup>

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 African Americans, Latinx, and Indigenous peoples.<sup>6</sup> African Americans generally evaluate the quality of other police activities, like police responses to calls for service, more negatively than do whites.<sup>7</sup> In the main, these broad characterizations are well documented by decades of careful research.

The recent protests and other calls for change in policing reflect these tensions. 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 Americans, and American institutions, embody racial biases. Even if intentional racism had faded—and it is clear it 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.<sup>®</sup> Put simply, the problems in policing are also the problems of American society,

<sup>1</sup>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).

<sup>2</sup>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.

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

<sup>4</sup>https://www.joincampaignzero.org/ solutions; https://m4bl.org/policyplatforms/end-the-war-on-blackcommunities/; 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.

<sup>5</sup> 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;

<sup>6</sup>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).

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<sup>&</sup>lt;sup>7</sup>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).

<sup>&</sup>lt;sup>8</sup>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).

and of American governing institutions and the economy. The demands for change reflect the democratic nature of policing in a second way, as these demands rest on the expectation that the police may be held to a democratic standard of equal service and respect for the dignity of all in the community. This equal service and equal respect for the dignity of all is the essence of an appropriate police profession. The protests also reflect the expectation that the police are ultimately accountable to democratic processes of decision. Nonetheless, the resort to protest indicates that many believe that these processes have not fulfilled their promise, and that something more than elections is needed to ensure democratic accountability.

A small body of peer-reviewed research suggests that college students evaluate the police more negatively than others do, and that Black students evaluate campus police more negatively than white students do.<sup>9</sup> As many college students from historically marginalized groups increasingly have experienced the forms of proactive policing typical of urban 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.<sup>10</sup>

It is within this larger national context that we conducted this review. ISU is impacted by both the history of policing on college campuses and the current calls for change. This review provided an opportunity to examine the current operations of the ISU Police Department and to listen to the ISU community about their needs and expectations related to policing on campus.

> <sup>9</sup>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 Notziger, "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.

> <sup>10</sup>Weitzer and Tuch, *Race and Policing*; Epp, Maynard-Moody and Haider-Markel, *Pulled Over.*

# SECTION III – GENERAL OBSERVATIONS AND MAJOR THEMES

#### **General Observations**

Based on our assessment, including our understanding of campus expectations regarding safety and security, we are pleased to report that the ISUPD is operating at a high level, has a transformational leader, and has dedicated staff committed to their campus safety mission. As with any external review, we identified opportunities for the department and University to enhance the campus safety services it currently provides. These opportunities, which we identify in depth throughout this report, should not detract from the department's exceptional work and performance, supported by the comments we received during our multiple one-on-one and small group meetings.

We are compelled to note that evolving campus and community expectations and shifting paradigms regarding the role of police in American society appropriately challenge police professionals, including campus safety leaders. These leaders must stay abreast of the changing landscape, listen to campus expectations, and constantly seek out information on evidence-based practices in effective, efficient, procedurally just policing.

In our view, several of the opportunities require immediate attention, such as policy enhancements and management of the department's internal affairs function, along with a need to consider staffing additions in the communications center and enhance training for staff in the communication center. Nothing we have seen or heard affects our opinion that Illinois State University and its police department are committed to providing the highest level of campus safety services to its community, aligned with campus expectations.

We commend the chief for his forward leaning approach to building and maintaining partnerships. We truly feel that the department's Community Engagement Unit and campus safety programming initiatives are a "best-in-class" model that provides a shining example for other campus safety departments. The Major Themes below, and the additional observations, should serve as a roadmap for continuous improvement.

#### **Major Theme 1: Clarify Internal Affairs Policy and Procedures**

ISUPD should provide additional clarity of, and command oversight for, the department's Internal Affairs (I/A) function. Initial interviews with department members led us to believe that the Investigations Lieutenant provides oversight for the I/A program. However, during subsequent interviews and following further analysis, we learned that the Lieutenant has not received any I/A training since taking over this important responsibility and lacks a familiarity with the fundamental

elements of this role, including how and when complainants are filed and how officers are advised of the outcomes of I/A investigations.

To further highlight our concerns, in two separate interviews with command staff members, we heard that the Deputy Chief and the Investigations Lieutenant share in the oversight of the I/A function. In yet another interview with the same command staff members, we were told the Chief has primary responsibility for the department's I/A process. Obviously, this feedback creates considerable concern about clarity.

Since the I/A function is the one of primary means by which campus safety departments hold their employees accountable, clarity of process is vitally important. Additionally, I/A investigations can be nuanced and complicated, and often require unique and sophisticated investigated techniques. We believe the department should designate a single command level officer, other than the Chief, to manage its I/A process and ensure that whomever assumes this role has appropriate training and investigative experience to manage this important job function.

#### Major Theme 2: Increase Staffing in the Communications Center Staff and Enhance Training for Communications Officers

In our professional opinion, current staffing in the Communications Center is inadequate to serve the needs of the ISU community, call volume and day-to-day activity. In general, it takes at least five people to staff one 24-hour call taking position. Due to personnel on military deployment and using Family Medical Leave, the Communication Center currently functionally only has five dispatchers and a "working supervisor." ISUPD's functional staffing level of five dispatchers and one supervisor means that during most shifts only one dispatcher is assigned to the communications center, leaving untrained patrol officers or supervisors to fill this important role when the communications officer needs a break or has to go home sick. We understand from our interviews that additional strain on the dispatch staff occurs whenever a vacancy occurs, as even one vacancy creates overtime for the remaining staff. It also means that the Communications Center supervisor must spend a significant amount of time working as a dispatcher, leaving little room or time for supervisory duties, oversight, and staff development. Additionally, this limited staffing presents a significant staffing concern and operational challenge if the department has to respond to a critical incident on campus.

In addition, the department needs to build upon the existing training currently provided to its communications staff. While ISUPD has developed its own training curriculum and Field Training Program, we feel it's important for the department to have communications leadership and staff, as well as any patrol officer assigned communications center duties, attend certified training provided through the Association of Public-Safety Communication Officials (APCO) or other professional communications training to ensure staff is kept informed and updated on quickly evolving best and promising practices in this important campus safety responsibility.

#### Major Theme 3: Address ISUPD Space Needs

Conducting an assessment of the campus safety facility was not within the scope of our review. However, we learned through our interviews with members of ISUPD and during conversations with many campus safety stakeholders, that the limitations of the University's existing campus safety facility may soon impact the department's ability to accomplish several of the goals identified in its strategic plan.

We acknowledge that moving from this space, shared with other University partners, to a newly constructed building is not currently part of the University's 20-year strategic plan. The University's desire to expand campus safety services has resulted in an increase in department personnel and expansion of services that has highlighted the need for the University to address the current space and functional needs of the department. We strongly encourage the department to facilitate the convening of a working group, comprised of the University's campus safety stakeholders to assist in identifying current and future facility needs, that have not already been identified through the department's strategic planning process.

#### Major Theme 4: Feedback from the Listening Sessions

Overall, the listening sessions (though sparsely attended) provided an opportunity to hear feedback about the ISUPD and general perceptions of campus safety and security, writ large. Staff, faculty, and students alike praised the Department for their work with the campus community and especially sang the praises of "Pawsifer Sage." In general, students, faculty, and staff find the ISU campus to feel safe and if they offered critiques about policing, they directed those at the departments in the neighboring towns of Normal and Bloomington. One session's participants, in particular, asked if the University could expand ISUPD's jurisdiction into the adjacent areas, as they would prefer to interact with ISUPD instead of those from adjoining cities.

Participants in the sessions shared their desire that ISUPD address safety initiatives in several areas. A few suggestions included creating more opportunities for students to engage with the ISUPD in terms of their career development, improving the quality of cameras and blue lights (there is some concern that some of these items are in disrepair), the need for the addition of crossing guards at key intersections, and the need for an assessment of the current staffing for events hosted by Black students to ensure that "aren't over-policed."

In one of the listening sessions, participants shared that ISUPD staff and leadership should ensure they actively listen to the lived experiences of students without questioning the authenticity of those experiences. Finally, we received comments that the department should be sure to publicize all of their training, especially related to anti-bias, diversity, de-escalation and prevention of violence.

## SECTION IV – SPECIFIC OBSERVATIONS

#### **Role, Mission, and Vision**

#### **Observations**

A clearly defined mission statement identifies the fundamental purpose of the work in which an organization engages and forms the basis of alignment within the larger institutional context. A formally articulated mission is essential for members of a campus safety department to ensure they understand their role in support of the institution's mission and should be an organic outcome of strategic planning. An accompanying "vision" tells department members and the public what the organization aspires to become in the future.

ISUPD outlines its formal mission statement and values in its policy manual and infuses it throughout the department's training and professional development initiatives. The department mission statement says: "The Illinois State University Police Department's mission is to serve, protect, and educate with pride and in partnership with our community." The department's core values are professionalism, respect, integrity, diligence, and equality. Every member of the department with whom we spoke was able to accurately reflect the department's mission and core values, and the importance of partnering with the campus community in their delivery of safety and security services. The department's vision statement states, "The Illinois State University Police Department will be a model of higher-education law enforcement committed to providing the highest quality of service to ensure the safety and well-being of the University community."

We were able to easily locate the department's mission, core values, and vision statement on the Department's website. In addition, during our interviews with department members, we saw the department's core values and mission statement displayed on the walls of the office spaces where these interviews were taking place. We were impressed that the department's mission, vision and community engagement philosophies are key focus areas during the department's hiring process and its new hire, field training and annual in-service training programs.

Institutions of higher education should endeavor to engage in consensus-based discussions that define the campus safety department's role and mission, ensuring that they are linked to the expectations of the campus community. Building on their existing work, we suggest the department's leadership team work with key partners and other campus safety stakeholders to enhance the department's current mission and vision statements to include the following concepts:

- The preservation of life and reduction of harm;
- Enhanced transparency and accountability;

- Procedural justice;
- Community buy-in and sustained engagement with the campus community; and,
- Rigorous, on-going, and evidence-based training and education.

Campus safety departments should engage in active planning and research of their internal activities to improve the delivery of services and provide a greater sense of safety to the campus community. Strategic planning for a campus safety department involves the analysis of current and future conditions, the development of personnel, and maximizing limited resources. Establishing short and long-term goals and identifying the objectives and action plans to accomplish each goal are fundamental to the planning process. Incorporating the planning function as a core operational process is vital to the continued growth and evolution of the department.

Campus safety organizations must be flexible in adopting strategies that both create and maintain a reasonably safe campus environment and meet the expectations of the campus community. Dr. John Bryson, author of *Strategic Planning for Public and Nonprofit Organizations* (2018) states<sup>11</sup>, "strategic planning at its best makes extensive use of analysis and synthesis in deliberative settings to help leaders and managers successfully address the major challenges that their organization faces." We were very impressed with the intentional and collaborative process taken to develop the department's strategic plan. The strategic plan, appropriately titled "A Vision for Campus Safety" and originally developed in 2018, links directly to the University's strategic plan that calls for the expansion of campus facilities and increased enrollment. In developing its strategic plan, the department collaborated with Environmental Health and Safety, Emergency Management, Student Affairs, Information Technology, Student Counseling Services, and University Housing Services to identify where service delivery improvements could be made and how they could better serve students in the future.

We believe that many of the department's strategic planning priorities align with the <u>Final Report of the President's Task Force on 21st Century Policing</u>. This Task Force was originally assembled to identify best practices and make recommendations to the President on how policing practices can promote effective crime reduction while building public trust. The department's strategic plan specifically identifies four of the six pillars identified in this report: Building Trust and Legitimacy, Technology and Social Media, Community Policing and Crime Reduction, and Training and Education.

The plan highlights staffing and facilities as two key focus areas for future development. Under the staffing section of the document, the following objectives are identified:

<sup>11</sup>Bryson, J. M. 1. (1995). Strategic planning for public and nonprofit organizations: A Guide to Strengthening and Sustaining Organizational Achievement. Rev. ed. San Francisco: Jossey-Bass Publishers.

- 1. Establish a Community Engagement Unit;
- 2. Increase and Retain a High Quality, Diverse Force;
- 3. Prepare for and Respond to Large Scale Events, Planned and Unplanned; and,
- 4. Respond to Evolving Technology, Legislative Mandates, and Industry Innovations.

Under the facilities section, the plan highlights:

- 1. Increase Staffing for Proactive Programming and Response;
- 2. Increase Accessibility of the Department to Visitors and Campus Constituents,
- 3. Establish Training Space for Leading Edge Professional Development;
- 4. Enhance Collaboration with Peer Institutions, Local Government, and Academies;
- 5. Equip a Facility and Staff to Adapt to an Evolving Campus.

Since implementing the plan, the department has been able to accomplish many of its strategic planning goals, including:

- Establishing a Community Engagement Unit;
- Adding a corporal to the dayshift;
- Purchasing a one-year license for new redaction software;
- Adding a Media Associate (in lieu of a Special Events Manager) to assist with FOIA requests;
- Creating dedicated visitor parking;
- Adding new wayfinding signage;
- Purchasing a de-escalation training simulator;
- Identifying additional training space;
- Adding one patrol car and an ATV to the department's vehicle fleet;
- Implementing a Body Worn Camera program; and,
- Implementing a Community Engagement K9 (Sage)

Throughout our assessment, we were made aware of the limited space and facility challenges the department currently faces. We are also aware the University is aware of the challenges of the current space and is actively attempting to address this issue. While assessing the University's campus safety facility was not a primary focus of our work, we offer the following to further support the need to address this matter as soon as circumstances permit.

The space for a university campus safety or police department should adequately and securely accommodate, within reasonable constraints, the administrative and operational functions of the department to include office space for the director and their command and administrative staff, along with the following:

- Private or semi-private space for the squad supervisors;
- Office space for specialty units such as the investigations branch and crime prevention staff;
- A report/paperwork preparation area for public safety officers;
- A briefing/ready room for public safety staff that can double as a training space. Ideally, this space should be planned as another area available to the greater campus community;
- Adequate interview/interrogation rooms for intake and criminal investigations, which allow for separate spaces for victims and witnesses;
- Secure processing and holding areas (cells) for detainees (constructed and maintained within state guidelines, if applicable);
- File maintenance and storage areas;
- Equipment storage areas (recognizing that campus public safety agencies generally have a high requirement for equipment storage, although not all equipment must be readily available);
- Adequate locker/shower/changing space for male and female officers;
- Adequate meeting rooms for small and large meetings (again, this is intended for both internal and campus community use);
- A welcome area for community members; and,
- Adequate parking for staff and emergency vehicles, along with a sally port for secure transport and detainee intake.

Ideally, the space would accommodate emergency management infrastructure such as the emergency operations center. The facility may also house other emergency services when possible.

The space should also be easily accessible to the campus community. Ideally, the facility would be highly visible in a location central to the main campus in order to facilitate access to essential safety and emergency management services. We recognize, however, that many other services, primarily those central to the academic or research mission, compete for the same central location.

#### Recommendations

- 1. Consider updating the department's mission and vision statements to include the following concepts:
  - The preservation of life and reduction of harm;
  - Enhanced transparency and accountability;
  - The implementation of procedural justice concepts in both internal and external interactions; and,
  - Sustained engagement with the campus community; rigorous, on-going, and evidence-based training and education.
- 2. Continue to collaborate with internal and external campus safety partners during the future refinement of the department's strategic plan.
- 3. Broadly communicate the department's strategic plan to the campus community and provide annual updates on the department's progress in meeting the plans goals and objectives.
- 4. When fully implemented, seek the guidance of the Police Chief's Advisory Council (PCAC) when developing the department's strategic plan.
- 5. Consider developing a campus safety facility working group to determine future department needs and to assist in identifying state of the art higher education campus safety facilities to help guide future planning initiatives.

#### Accountability

#### **Observations**

Internal accountability in a police department is a primary means of gaining the trust of the community. Accountability is comprised of a system of checks and balances validating that employees perform within the boundaries of law and agency policy, and holding those that fail to do so accountable for their actions. The overarching goal of accountability is to foster honest and compliant behaviors, deter deviant behaviors, and ultimately increase public confidence in the organization. Accountability systems typically include strong policies and procedures, effective leadership and supervision, systematic review of employee actions, and ultimately, a publicly accessible complaint process that is transparent, fair, and effective in investigating misconduct allegations.

Since the internal affairs function is the primary means by which agencies assess the behaviors, conduct, and professionalism of their employees, it is of the utmost importance that it be open, fair, and impartial in order to maintain the public's trust. We conducted a review of ISUPD's processes for addressing complaints and allegations of employee misconduct. While we address the department's policy challenges later in this report, we believe that the I/A function lacks clearly defined oversight and management.

In the Major Themes section of this report, we detailed our concerns regarding the internal lack of clarity with the department's I/A function. While we are not repeating these concerns here, we highlight the confusion, both in understanding and policy and re-state how this confusion may negatively impact the credibility of the department's accountability and transparency initiatives.

The department's Internal Affairs policy must clearly identify who is responsible for managing its internal affairs program and members must have a good working knowledge of this policy and receive updates on any changes or revisions. Confusion over who has responsibility and oversight for this important job function can lead to poorly supervised or mismanaged investigations. Additionally, since the Chief is the final arbiter of I/A investigations, he should not be conducting these investigations, nor should he be the manager of the program. In light of this, we strongly recommend that ISUPD re-evaluate the oversight and management its I/A processes and designate a single command level officer, other than the Chief, to manage the function. Our assessment informs us that the Deputy Chief is best positioned and likely the most qualified to fill this role in the department.

By practice, all complaints go directly to the Chief who assigns either the Deputy Chief, Investigative Lieutenant, or a Sergeant as the investigator. Through our analysis, we learned that only the Deputy Chief has received any formal I/A investigative training. I/A investigations can be nuanced and complicated and should be conducted in a manner which is substantially different than a typical police investigation. We recommend that staff assigned by policy to conduct an IA investigation receive specialized training such as that offered by the Public Agency Training Council (PATC) and the FBI's Law Enforcement Executive Development Association (LEEDA). We also understand the ILETSB Mobile Team Units provide Internal Affairs training, and ISUPD can contact their specific unit (MTU8) to identify when and how to receive that training.

While ISUPD provides information regarding citizen complaints on its web page, the information does not emphatically state that the department accepts any and all complaints of misconduct. ISUPD should update this page with a statement affirming that all complaints, including those made anonymously, will be accepted and fully investigated.

ISUPD also utilizes an online complaint form. This form, however, includes the complainant's name, address, and phone number as mandatory fields requiring completion prior to submission. This requirement eliminates the option for a community member to submit a complaint anonymously and may discourage some from filing a complaint. We recommend that ISUPD modify the online complaint form to allow for anonymous submissions.

Additionally, ISUPD does not currently compile annual statistical summaries of the I/A complaints received by the department in a given calendar year. Contemporary standards, including those from CALEA and IACLEA, recommend the publishing of these summaries on an annual basis. We encourage the department to consider publishing this information as soon as it settles cases.

ISUPD does not have a formal early warning policy or procedure in place. Early warning systems are critical as they identify employees in need of training, remedial actions, or potential behavioral and performance based intervention. The department's I/A policy allows for the "informal" handling of citizen complaints in instances where the complainant is satisfied with the intervention/actions taken by a supervisor. These cases do not require the completion of a citizen's complaint form, instead, the supervisor emails the details of the matter to the Deputy Chief who keeps an informal personnel file on each employee. Since there is no early warning policy, or formal thresholds to initiate a review of employee actions or behaviors, any intervention, training, and counseling needs identified from these "informal" complaints are at the sole discretion of the Deputy Chief.

In our opinion, this practice is subjective and we are concerned it may create a situation where some patterns of behavior may go unnoticed and unaddressed. We believe an opportunity exists for ISUPD to strengthen its accountability practices through the adoption of an early warning process and policy that stipulates all incidents of counseling, remedial training and corrective action taken by supervisors be formally documented. The policy should establish thresholds that trigger a review of specific performance actions or employee behaviors.

A comprehensive early warning policy should include at least the following:

- Definitions of employee behaviors or actions to be included for review;
- Thresholds to initiate a review of employee actions or behavior;
- Agency reporting requirements of conduct and behavior;
- Responsibility of supervisors;
- Available remedial actions; and
- Some type of employee assistance such as an EAP, or peer counseling program.

While we do not support one early warning system over another, we point to <u>IA</u> <u>Pro</u> and <u>Guardian Tracking</u> as potential software systems that can provide these early warning platforms.

To promote accountability, the department should provide 24/7 first-line supervision through the presence of a ranking officer, traditionally holding the rank of Sergeant or Corporal, or another appropriately trained "officer-in-charge." First line supervisory staff is responsible for the morale, discipline, and training of their respective shifts.

Supervisors should lead by example and support and enforce agency policies and procedures. Additionally, they must know how and when to make the appropriate emergency notifications during a critical incident.

The current organizational structure at ISUPD designates patrol sergeants as shift supervisors. These patrol sergeants are responsible for the day-to-day supervision of the officers assigned to their respective shifts. However, current staffing and scheduling challenges negatively impact this model, leaving some shifts without a first line supervisor. When the shift sergeant is off duty or unavailable, a corporal assumes the role of shift supervisor. Corporals receive a monetary stipend for this added responsibility and receive supervisory training, including FTO-type training from a sergeant before they can act as a shift supervisor.

We learned, however, that several times a month, there is neither a sergeant nor corporal on duty and a senior patrol officer assumes the duty of "acting supervisor." It does not appear that the department is providing supervisory training to these senior officers to prepare them for this added responsibility. Additionally, UPD does not have a policy that outlines the duties and responsibilities of these officers when acting in this supervisory capacity.

While their title may be "acting supervisor" it appears their official role lacks the necessary clarity for them to be successful in this function. Department members reported that acting supervisors have no authority to make decisions and the unwritten expectation is that they call their off-duty sergeant any time a decision is necessary. In fact, one stakeholder stated that acting supervisors are "just there to sign paper," indicating their sole responsibility is to approve reports. In our opinion the "acting supervisor" role is in fact powerless and leaves patrol shifts without the appropriate supervision. Furthermore, having to place phone calls in situations requiring a decision can create unnecessary delays in emergency response resources being deployed during a critical incident on campus. The absence of an appropriately trained and empowered first line supervisor creates a void in the department's accountability process and may place ISUPD in a litigious situation. Because of this, we recommend the department either eliminate the role of the "acting supervisor," or provide the requisite training to these senior officers. Ultimately, the department must ensure that a fully trained and empowered fulltime sergeant or corporal or an appropriately training "acting supervisor" manages each patrol shift.

Finally, we are concerned that line supervisors are being considered part of the departments minimum patrol shift coverage requiring 2 officers to be on duty during any shift. This practice means that at times, patrol shifts can be covered by 1 officer and 1 supervisor, which requires the supervisor to respond to calls for service while trying to manage shift operations. We believe this practice places an unreasonable burden on the supervisor and likely detracts from the supervisor's ability to actively supervise, manage, and mentor their subordinates.

#### Recommendations

- 6. Consider designating a single command level officer, other than the Chief, to manage the departments I/A function.
- Ensure all I/A investigations are conducted by members who are appropriately trained to conduct these investigations and are familiar with the department's I/A policies and procedures.
- 8. Update the department's web page to include a statement that informs the campus community that any and all complaints, including anonymous ones, will be accepted and fully investigated.
- 9. Modify the online complaint form to allow for anonymous submittal of complaints.
- 10. Complete an annual I/A summary and post the summary on the department's website.
- 11. Adopt an early warning policy and process.
- 12. Consider the use of an early warning software platform.
- 13. Eliminate the use of the "acting supervisor" role and ensure a fully trained sergeant or corporal oversees each patrol shift.
- 14. Reconsider the existing department practice of counting shift supervisors as part of the minimum staffing requirement.

#### **Transparency**

#### **Observations**

As noted throughout this report, a campus safety department's success in accomplishing its mission relies, in part, on the relationship it has with the campus community. Progressive campus safety leaders provide a framework for their departments to build positive relationships with the communities they serve based upon shared values, mutual respect, trust, and the co-creation of campus safety.

The on-going national reckoning regarding racial justice and the role of police in American society adds to the decades-old tensions felt between police and some communities, especially the BIPOC communities. One way to address this persistent tension and, simultaneously build trust, is to enhance transparency between campus safety departments and their community.

Toward this end, ISUPD has made significant personnel and technology investments to enhance transparency into the department's operations. The department's leadership team has worked to build a virtual platform and robust social media presence that includes a website, Facebook page, Twitter and TikTok accounts. We were very impressed with the amount of information the department is currently sharing on its website. We were easily able to locate the following information:

- The 2019 Annual Safety, Security and Fire Safety Report;
- Campus Violence Prevention Plan;
- ISU Police Crime Prevention and Safety Brochure;
- Citizen Complaint and Compliment reporting process;
- Information about the department's Mission, Vision and Core Values;
- ISUPD Organizational structure;
- Police records request process;
- Information on the department's training program;
- Background information on the department's Community Engagement Unit;
- Department crime prevention programming offered to the campus community; and,
- Daily crime log and recent crime advisories.

However, we were unable to locate information involving:

- The number of complaints registered against members of the department in 2020 and previous years, including the outcomes of the investigations into these complaints;
- The numbers and circumstances surrounding the Use of Force by department members in 2019;
- The department's high liability policies that include use of force, vehicle pursuits, internal affairs, training, response to a mental health crisis, evidence and property storage, recruiting and hate crimes;
- The gender and ethnicity of those stopped for motor vehicle infractions;
- Department employee demographic data; and,
- Information on the department's recruiting efforts, specifically as they relate to enhancing diversity, equity and inclusion.

<u>The Final Report of President's Task Force on 21st Century Policing</u> "Pillar 1 - Building Trust and Legitimacy" contains an important recommendation that states, "Law enforcement agencies should establish a culture of transparency and accountability in order to build public trust and legitimacy. This will ensure decision making is understood and in accord with stated policy." One of the action steps identified to address this recommendation states, "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 aggregated by demographics." We commend ISUPD for the significant efforts towards enhancing transparency. We believe the department should continue to collect and report all critical data, as determined by the campus community. In essence, we recommend a metric dashboard including the information cited above. We are providing several examples of higher education campus safety departments with strong transparency practices that 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/

The International Association of Chiefs of Police (IACP) and other law enforcement associations have written extensively on the importance of communication to enhance transparency and strengthen collaboration between law enforcement and communities. The 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."

While reviewing the department's Facebook page, we noted that they have 7,020 followers and the department had 5 "posts" in the month of March, 2021. The department's Twitter feed has 2,701 followers and the department had 6 "posts in the same month. We were pleased to learn that the department has leveraged the popularity of their police canine (Pawfficer Sage) to draw members of the campus community to their Instagram and TikTok accounts. We encourage the department to continue to pursue robust, evidence-based community outreach and transparency programs designed to enhance trust and build stronger and more inclusive community partnerships. We highlight Iowa State University Police's Twitter presence Iowa State Twitter feed which they use both as a transparency initiative, and for relationship building. The U.S. Department of Justice also has an excellent article titled "Social Media 101: Putting It to Work for Your Agency" that, while dated (2015), continues to be relevant in present time.

We learned during the review that the Chief recently formed a new Police Chief's Advisory Council (PCAC). While still in its infancy, the formal charter proclaims that... "The purpose of the PCAC is to provide a forum for the exchange of ideas

and to discuss issues impacting the Illinois State University community. The intent of the discussions is to be open, honest, and engaging. The PCAC is intended to act in a proactive manner to:

- Build trust between the police department and the campus community;
- Address campus community concerns related to the quality of life;
- Discuss issues related to campus climate;
- Discuss issues affecting public safety;
- Discuss crime reduction programs with emphasis on the community policing philosophy;
- Discuss evidence-based practices and criminal justice research; and,
- Discuss how to improve upon the delivery of police services to the campus community."

It is generally accepted that communities should tailor their external advisory boards to meet the particular needs and characteristics of their population, their police agency and expectations of community stakeholders.<sup>12</sup> Common characteristics of most external boards include independence from and cooperation with the police department, adequate authority to act, sufficient access to police department records, an ability to communicate with the chief of the agency, support of the relevant stakeholders, and adequate resources. Contemporary standards also call for oversight boards to engage in community outreach, to include members of the community on the board and to periodically issue public reports, including reports on patterns of alleged abuse by police.<sup>13</sup> While the University does not expect the PCAC to serve as an "oversight" board, and this is completely appropriate given our earlier statement that local communities should determine the form of its advisory or review board, it does shares similarities with more traditional oversight committees. We encourage the University to stay abreast with evolving campus community expectations regarding oversight, and with the changing landscape related to civilian oversight. The University may find it valuable to adopt a different paradigm about its advisory committee, especially regarding leadership of the group.

We reviewed the proposed membership of the PCAC and are encouraged by the level of inclusiveness. The University should routinely review the composition of the group to ensure its represents the various voices at the University. Through our recent work with colleges and universities, many institutions have formed similar advisory or external review committees in an attempt to further build accountability and transparency. We encourage the department to leverage the work of this group to assist in identifying organizational strengths and potential points of friction with the relationship with the campus community.

<sup>12</sup>U.S. Department of Education, Office of Justice Programs, National Institute of Justice, *Citizen Review of Police: Approaches and Implementation* (March 2001). Stated another way, jurisdictions should focus on "best-fit" of the various types of civilian oversight boards, as opposed to "best practices." National Association for Civilian Oversight of Law Enforcement, *Civilian Oversight of Law Enforcement: A Review of the Strengths and Weaknesses of Various Models* (Sept. 2016).

<sup>13</sup>National Association for Civilian Oversight of Law Enforcement, *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016).

#### **Recommendations**

- 15. Gather gender identity, race, and ethnicity demographics for motor vehicle stops, arrests, and uses of force. Share the demographic breakdowns in publicly available department reports, published monthly.
- 16. Broaden the department information/reports shared on ISUPD's website to include the following:
  - a. Reports for the number of motor vehicle stops conducted, arrests made, and uses of force by members of the department;
  - b. Recruiting efforts; and,
  - c. High liability department policies that include: use of force, vehicle pursuits, internal affairs, training, response to a mental health crisis, evidence and property storage, recruiting and hate crimes.
- 17. Consider sharing the gender identity, race, and ethnicity demographics of the ISUPD.
- 18. Continue to highlight the department's transparency initiatives using a variety of social media platforms.
- 19. Once fully developed and implemented, leverage the work of Police Chief's Advisory Council to further build the department's transparency initiatives.
- 20. Ensure information about the CPAC is accessible on the department's website as well on other campus safety related University webpages.
- 21. Stay abreast with the rapidly evolving standards and expectations of advisory and/or external committees.

#### **Training and Professional Development**

#### **Observations**

Training is one of the most important responsibilities in a campus safety agency. Properly implemented training reinforces the delivery of services in alignment with the department's mission and University values. Well-trained officers are generally prepared to act appropriately and decisively in most situations and tend to be more productive and professional. Training also fosters cooperation and unity of purpose within the department and campus community. Robust training for campus safety officers aligned with contemporary standards, legal requirements, and community expectations is essential in a higher education environment where officers must understand the unique and complex nature of higher education including student development, faculty culture, free speech ideals, diversity, and campus climate. A department's training program must be inclusive of the leadership, entry and mid-level team members, and those filling specialty assignments. A well designed and administered training program limits institutional risk and liability and postures the agency to deliver exceptional, fair, and equitable safety and security services to the community.

In 2016, the International Association of Chiefs of Police and George Mason University Center for Evidence-Based Crime Policy, conducted an evidence-based review of the recommendations,<sup>14</sup> including Pillar 5 (Training and Education) of the <u>Final Report of the President's Task Force on 21st Century Policing</u>. According to this review, the report's recommendations remain relevant and should remain as important focus areas:

- Include more community input into police training and integrate leadership training throughout officers' careers;
- Integrate new training into existing curricula, including modules on crisis intervention and responding to mentally ill individuals; implicit bias and improving social interactions; addiction; policing in a democratic society; and responding to diverse communities, minority, LGBTQ, and various religious groups; and,
- Incentivize and encourage higher education for officers.

ISUPD and the University have robust initiatives to incentivize and encourage higher education for officers. The department meets the <u>Illinois Law Enforcement</u> <u>Training and Standards Board</u> (ILETSB) program mandates, and is in alignment with the <u>Illinois Association of Chiefs of Police ILEAP</u> (Illinois Law Enforcement Accreditation Program) standards. The department closely monitors its training programs with a keen focus on diversity, equity and inclusion programming. We applaud ISUPD for their recent acquisition of a Use of Force simulator, and encourage their stated intent to share this training tool with campus stakeholders. This type of training tool can provide community members with an avenue to safely experience various challenging situations that officers may encounter during their work.

While we acknowledge that the department's training committee and related Policy #208 (subsection 208.6) meets state accreditation standards, we encourage the leadership team to broaden the committee membership by including a diverse cross section of the campus community, especially student leaders representing Black, Indigenous, and other People of Color (BIPoC) organizations and communities. Expanding the committee's membership creates an opportunity for community members to provide input into on-going and future department training initiatives. Including diverse internal and external campus safety partners can also enhance trust, transparency and legitimacy.

The most frequently raised training concerns expressed by department staff related to their ability to respond to critical incidents on campus. Pillar 5 of the Final Report of the President's Task Force on 21st Century Policing Task states, "Today's line officers and leaders must be trained and capable to address a wide variety of challenges including international terrorism, evolving technologies, rising

<sup>14</sup>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. immigration, changing laws, new cultural norms, and a growing mental health crisis." This includes readiness for all department members, including the communications center staff.

We discussed our communications center concerns in Section III of this report and reiterate here that, in our opinion, the department's communications center staff should receive industry-accepted telecommunicator training and certification, such as that provided by the <u>Association of Public-Safety Communications</u> <u>Officials</u> (APCO International). We understand that the dispatch field training program is modeled after the APCO Public Safety Telecommunicator course and standards; however, we believe that the achievement of this training certification would enhance the professionalism and lend to the credibility of this important function. Additionally, APCO offers many of its courses online, reducing the cost of attendance by removing related travel expenses. Another potential resource for dispatcher crisis communications training is the <u>Public Agency Training Council Crisis Communications</u> course.

In addition to addressing the concerns in the communications center, we provide further evaluation of the four phases of the department's training program. We address these areas below in the sequential order in which they generally are provided to department members versus their individual order of importance.

#### **Initial/Recruit Training**

The investment a department makes to on-board and initially train campus safety officers influences the probability of their success and enhances their level of job satisfaction. After conducting our analysis of the department's initial/recruit training program, we did not identify any areas of concern and encourage the department to continue its practice of regular review of this training program to ensure it continues to meet the needs of the department and the campus community.

#### Field Training Program

Field Training Officer (FTO) programs play a critical role in aligning newly hired officers with the University and department's mission, vision, and values. Certified FTOs lead police recruits through the transition from the relatively safe learning environment of the academy, to line-level officers where mistakes can lead to unfortunate and sometimes life changing outcomes. The department currently assigns new officers to a variety of FTO's, all of whom have formal certification through "a department-approved FTO course". All FTO's are required to attend a triennial FTO course update to continue this important training function. In his 2003 research on the effectiveness of a public safety FTO program, Mike Novakowski wrote, "If the content of the field training were called the 'song,' and the FTO the 'singer,' the data shows that the song is not as important to the overall satisfaction

of the performance. It is the singer that has the highest relationship to satisfaction."<sup>15</sup> Assigning a trainee to various certified FTOs shows new officers a variety of styles and techniques that meet department expectations, and builds the confidence needed to be successful in the campus safety profession.

We understand that the department is in the process of re-formatting its FTO manuals to highlight functional areas that include: mission, role, values, cultural competency, appreciating diversity and inclusion, anti-bias, and other contemporary policing training that the department provides to newly hired communications and patrol officers. The current patrol FTO manual already includes training in many of the areas needed for officers to be successful in a higher education environment that include:

- Interpersonal communication;
- Customer service;
- Crisis intervention or responding to an active mental health crisis;
- Professional ethics; and,
- First intake for sexual assault victims and trauma informed sexual assault investigation.

We also understand that pre-pandemic, the patrol officers' FTO program included introductions to staff from key stakeholders such as residential life, Dean of Students office, athletics, facilities, student affairs, human resources, emergency management, student government, and the counseling center. We encourage the department to continue this practice and recommend that the department include newly hired communication officers in these introductions.

#### **In-Service Training**

Contemporary critics of law enforcement training opine that departments should be doing more in terms of on-going and in-service training. Pillar 5 of the Task Force report highlights the need for police departments to develop on-going training programs designed to provide officers with the knowledge, skills and abilities to be successful in their roles. The report specifically stipulates the need for ongoing training related to implicit bias, managing a mental health crisis, policing in traditionally disadvantaged communities, and leadership.

We applaud the department for developing a robust in-service training program that requires staff to participate in regularly scheduled training activities. The department has a comprehensive training plan that guides its training efforts, including a matrix that outlines the type of training that will occur during the different phases of employment and individualized and unit-specific training and professional development plans. On an annual basis, department members receive training in

<sup>15</sup>Novakowski, M. (2004). Police Field Training Officers: It's the singer, not the song. *The Canadian Review of Policing Research*, 1. Retrieved from <u>http:// crpr.icaap.org/index.php/crpr/article/ view/3/3</u> the areas of legislative updates, state mandated training modules, relevant critical issues, and university-specific training.

Members of ISUPD charged with performing in a specialized position such as investigations, FTO, or training instructor generally have an introductory and ongoing training performance plan in place. These plans identify a clear set of required skills, training, or tasks for each specialized position within the department. As discussed earlier, we identified improvements necessary in the training of individuals responsible for managing the Internal Affairs/Professional Standards program.

We know through our work that delivering high quality campus safety services requires a commitment of time and significant financial resources. When evaluating future training investments, we recommend the department's leadership consider available University subject matter expertise and willing stakeholders as one way to maximize training opportunities and collaboration and potentially reduce training costs. While students universally shared their perception of solid working relationships with ISUPD; we heard from several that they are unaware of the type and efficacy of training received by department members. Including students in appropriate training programs can contribute to building trust and confidence. These programs may include:

- Cultural competency and implicit bias;
- Response to bias incidents and understanding hate crimes;
- Suicide prevention and education;
- Special event security/safety planning; and,
- Response to protests and demonstrations

For example, ISUPD could consider leveraging existing University resources and campus partners to develop workshops that include role-reversal conversations and scenarios to facilitate restorative conversations around race and policing. Carlson-Sabelli and Sabelli argue that role reversal allows protagonists to become aware of their interpretations and hold them up for re-examination, thereby providing a way to go beyond them.<sup>16</sup> ISUPD could incorporate the use of their recently acquired Use of Force simulator for this or other similar educational demonstrations.

We also recommend post-training assessment and feedback data collection to measure each program's effectiveness. The <u>Kirkpatrick Model of Training &</u> <u>Evaluation</u><sup>17</sup> outlines four levels of outcomes that we might measure following an educational intervention:

- 1. Reaction
- 2. Learning
- 3. Behavior

<sup>16</sup>Carlson-Sabelli, L. and Sabelli, H.C. (1984) 'Reality, perception, and the role reversal', Journal of Group Psychotherapy, Psychodrama and Sociometry 36: 162-74

<sup>17</sup><u>https://www.kirkpatrickpartners.</u> com/Our-Philosophy/The-New-World-<u>Kirkpatrick-Model</u> as viewed on March 25, 2021 4. Results (the degree to which desired organizational outcomes occur following a training)

While Kirkpatrick Model levels 3 and 4 certainly prove more challenging to evaluate in a survey, being intentional to include questions that get at these higher levels in some manner can give the department a more informative picture of the outcomes of training and experiential sessions. Questions like "What goals can you set for yourself based on the material covered in this session?" can not only scratch the surface of potential behavioral change, but can also aid participants in synthesizing takeaways and setting intentions that are more likely to translate to action.

The Intercultural Development Inventory<sup>18</sup> is another validity-tested psychometric tool that measures how people respond to cultural difference. In addition to being highly respected in the field, it has the added benefit of going beyond reactions and knowledge to assess deeper levels of attitudes and behaviors. It is a longer assessment best suited to in-depth analyses of personal or organizational development around diversity, equity, and inclusion, but particularly when it is used as a pre- and post-assessment tool around long-term learning or interventions, the results will be very telling about how effective the program was at moving participants along in their developmental journey.

We reiterate our commendation regarding the training assessment approach used in the department's training program. It is apparent to us that ISUPD, including leadership, sworn, and civilian staff, all understand and embrace the attention paid to training. Our recommendations are to enhance what is already a thoughtful training program. We encourage ISUPD to continue to prioritize the building and implementation of their training program to ensure its members remain current with the contemporary issues of campus safety globally, and those specific to the University.

#### Recommendations

- 22. Enhance the existing internal training committee to include representatives of the various units and ranks as well as key stakeholders to provide input and recommendations to the chief and deputy chief relative to the annual department-wide in-service training program.
- 23. Provide professional dispatch and crisis communications training to all ISUPD dispatchers. Include dispatch staff in exercises to develop those skills when available.
- 24. Ensure that dispatchers are introduced, virtually or in-person, to key campus partners.
- 25. Ensure all current and future communication center FTOs attend and complete the appropriate certification program.

<sup>18</sup> <u>https://idiinventory.com/</u> <u>generalinformation/</u>asviewed on March 25, 2021

- 26. Continue with department plans to redesign the Field Training Officer manuals to include the department's mission, role, values, cultural competency, appreciating diversity and inclusion, anti-bias, and other contemporary policing training. Schedule an annual review of these important manuals.
- 27. Review the task and skills list with the training committee and update as needed for all positions in the department.
- 28. Consider amplifying department outreach efforts to include the depth of ISUPD training program and frequency of the department's diversity and inclusion training and experience commitment.
- 29. Explore additional opportunities to participate in joint training and education efforts with University and community stakeholders, including demonstration and hands-on exposure to the use of force simulator.
- 30. Publish an annual report summarizing the department's overall training completed during department sponsored in-service and via external training resources.
- 31. Develop and implement a training program evaluation process, including how the feedback gathered will be reviewed for enhancing department training initiatives.

#### **Written Directives**

#### Observations

It is essential for a campus safety department to have a formal written directive system to provide direction, structure, and process to its members. Clarity and ease of access to information are important in effectively implementing written directives. Though it is not realistic or necessary that every policy be memorized, critical task policies should be clear in the mind of each staff member responsible for discharging a duty or policy requirement.

Additionally, department members should be familiar with existent policies and should know that a policy exists and where they can locate it when needed. As an Illinois Law Enforcement Accreditation Program (ILEAP) accredited agency, we found that overall, UPD has well developed policies and procedures.

UPD contracts with Lexipol, a nationally recognized vendor, to provide, publish and maintain its written directive system. Through conducting a high level review of several critical policies we provide several opportunities to enhance the department's written directive system to better align them with best and promising practices in campus safety.

#### **Complaint Process/Internal Affairs**

Policy #1020 "Personnel Complaints" governs the complaint/internal affairs (I/A) process. While this policy meets ILEAP accreditation standards and provides some adequate direction, we found it to be lacking in several critical criteria and stipulations to be in alignment with the nationally recognized standards of CALEA and IACLEA accreditation. Meeting the stringent standards detailed below will only serve to strengthen UPD's accountability and transparency. Additionally, we have included two robust I/A policies for future reference in Attachment VI of this report.

#### Recommendations

- 32. Provide a clear definition of the types of incidents that qualify as "informal complaints," for example, demeanor complaints or civilian misunderstandings of police procedures.
- 33. Remove the "incomplete" definition of citizen complaints. Adjust the policy to state that ISUPD will investigate all complaints to the fullest extent possible even if the complainant becomes unavailable or uncooperative.
- 34. Add language to section 1020.4 stating that all complaints, including anonymous ones, will be accepted and fully investigated.
- 35. Provide clear procedures for notifying the Chief of all complaints.
- 36. Add language specifying what types of allegations require immediate notification of the Chief (i.e., criminal allegations, civil rights violations etc.)
- 37. Specify the types of allegations that may be investigated by first line supervisors and types that must be investigated by the I/A function.
- 38. Specify who will investigate criminal allegations of misconduct.
- 39. Update the policy to specify the pausing of I/A's during a criminal investigation.
- 40. Amend section 1020.7.4 to state that I/A investigations shall be completed within 30 days of the complaint's receipt.
- 41. Add language to section 1020.7.4 to state that the Chief may extend an investigation beyond 30 days due to extenuating circumstances.
- 42. Add a stipulation that an annual statistical summary of I/A complaints will be prepared and placed on the department's website.
- 43. Add language to section 1020.14.3 specifying exactly how subject officers and complainants will receive notification of complaint dispositions.

#### Use of Force

Department Policy #300 governs the Use of Force. This policy is comprehensive and includes many evolving expectations and contemporary standards. including:

- A duty to intervene when officers observe another member using unreasonable force;
- A requirement to utilize de-escalation techniques and non-violent strategies when reasonable;
- A ban on choke holds unless deadly force is justified;
- A requirement that officers warn that deadly force may be used when reasonable;
- A duty to provide medical assistance after the use of force;
- Mandatory reporting when force is used; and,
- A supervisory response when the use of force results in any injury.

#### Recommendations

- 44. Add language that explicitly bans the use of warning shots.
- 45. Add a use of force continuum such as that provided by the National Institute of Justice.<sup>19</sup>
- 46. Add language requiring the review of all use of force reports by the Deputy Chief.
- 47. Add language requiring entry of all use of force incidents into an early warning system.
- 48. Add language stipulating the creation of an annual statistical summary of use of force incidents that is placed on the department's website.

#### **Crisis Intervention Situations**

Policy #467 "Crisis Intervention Incidents" and #418 "Civil Commitments" regulate ISUPD responses to those experiencing a mental health crisis. This policy is comprehensive and contains many forward leaning aspects including a requirement that officers employ conflict resolution and de-escalation techniques when dealing with an individual in crisis; a requirement that officers consider alternatives to force including a reduction of on-scene officers to avoid escalating the situation; and finally, a requirement that the on-duty supervisor conduct a written after action review of the incident and forward it to the Deputy Chief for command review. Additionally, we are pleased that per Illinois state law, all officers receive mandatory CIT training after 2 years of service.

While the policies state that ISUPD will coordinate a crisis intervention strategy with Student Counseling Services, University Housing, Dean of Students Office,

<sup>19</sup><u>https://nij.ojp.gov/topics/articles/</u> use-force-continuum Student Behavioral Intervention Team, and the Faculty/Staff Care Team, it does not clarify whether or not there is a coordinated/joint response with ISUPD to those in crisis. Increasing national conversations regarding police response to mental health crises has many agencies reconsidering their approach.

A growing trend is the use of a Crisis Intervention Team (CIT). Such teams are generally comprised of specially trained police officers and mental health professionals. "They collaborate to address and de-escalate high–stress mental health situations, while having the range of skills required to handle possible dangerous developments."<sup>20</sup> We believe that ISUPD should consider alternative approaches to those suffering a mental health crisis, including partnering with available on-campus resources in a coordinated response.

#### Recommendations

- 49. Clarify section 467.11 to specify exactly if/how responding officers should coordinate crisis response with Student Counseling Services, University Housing, Dean of Students Office, Student Behavioral Intervention Team, and the Faculty/Staff Care Team.
- 50. Add a list of local mental health resources and procedures for accessing the competencies of these organizations.

#### **Sexual Assault Investigations**

Policy #617 "Sexual Assault Investigations" guides the UPD response to reports of sexual assaults. This policy to comprehensive and aligns with best practices regarding trauma-informed response. The policy includes a stated goal to: "minimize the trauma experienced by the victim," and requires the assignment of "qualified investigators" with "specialized training" in these cases. We subsequently verified through stakeholder interviews that all investigators undergo training every three years related to trauma-informed response to sexual assault victims. This approach is a best practice and commend UPD for requiring this on-going certification. Additionally, the policy calls for the notification of critical offices such as the Title IX office.

#### Recommendations

- 51. Add language specifying exactly when the specially trained "qualified investigators" should be notified and by whom.
- 52. Add language listing available support resources for victims.

#### **Bias Based Policing**

Policy #402 "Bias-Based Policing" explicitly prohibits bias-based policing by department members, stating, "Members will not use actual or perceived race, ethnicity, color national origin or ancestry, gender, religion, age, disability, sexual

<sup>20</sup>Butler, Stuart M and Sheriff, Nehath. "Innovative solutions to address the mental health crisis: Shifting away from police as first responders." The Brookings Institute 23 November 2020. <a href="https://www.brookings.edu">https://www.brookings.edu</a>>
orientation... as the sole basis for developing reasonable suspicion or grounds for a traffic or street stop..." This policy is comprehensive and includes a duty for officers to intervene to prevent and report any bias-based actions by a member of the agency. The policy calls for first line supervisors to "periodically review audio and video recordings and Mobile Digital Computer data" to validate officers' compliance with the policy. The policy also mandates the recording of demographic data on "stop cards" every time an officer conducts a traffic or pedestrian stop. While ISUPD reports the "stop card" data to the Illinois Department of Transportation twice annually, it does not appear the department conducts internal analysis of the data to identify trends and patterns that may point to bias-based action or lead to allegations of such. We believe UPD would benefit from a monthly analysis of the stop card data.

#### Recommendations

53. Utilize "stop card" data to complete a monthly internal analysis to identify trends and patterns that may lead to bias policing allegations.

#### Vehicle & Pedestrian Stops

Policy #500 "Traffic Function and Responsibility" governs traffic stops and subsequent enforcement. The policy explicitly states that the goal of traffic enforcement is to reduce traffic collisions. It further states that enforcement actions shall be consistent with applicable laws and the severity of the violation. It also clearly forbids ticket quotas, further elaborating that the department does not use citation volume as an evaluative factor in officers' overall performance. This policy complies with ILEAP standards, as well as CALEA and IACLEA standards.

We are unable to identify a policy specifically addressing pedestrian stops. This is not unusual as we are unaware of any accreditation standards requiring such a policy. However, we found that UPD policy #440 "Contacts and Temporary Detentions" as well as #402 "Bias Based Policing," provide direction for officers when stopping pedestrians. Policy #440 specifically provides direction for officers regarding consensual encounters, field interviews, pat-down searches, and field photographs. The policy requires the issuance of a stop receipt containing the officer's name, badge number, and reason for the stop every time an officer conducts a pat down search in a public place.

Policy # 402 requires the completion of a "stop card" whenever an officer detains, conducts a pat down search, arrests, issues a summons to, or searches the property of a pedestrian. As noted previously the "stop cards" collect data reported to the Illinois Department of Transportation. We again believe that UPD would benefit from a monthly analysis of the stop card data.

#### Recommendations

54. Utilize "stop card" data to complete a monthly internal analysis to identify trends and patterns that may lead to bias policing allegations.

#### **Community Policing and Campus Engagement**

#### Observations

Municipal and campus police are always, appropriately, under scrutiny for how they engage with the communities they serve. Such scrutiny today is viewed through the lens of how a department engages with communities of color, individuals who are undocumented, and others who are members of traditionally underserved or disenfranchised communities, such as the LGBTQ+ community. Community policing initiatives and community engagement activities hinge upon the approach a department develops and intentionally implements to build, restore, or earn respect from the communities they serve.

Contemporary standards in the area of Community Policing and Community Engagement dictate that a campus safety department should develop community engagement and crime prevention initiatives based on data that reflect community needs and input. Departments should consistently evaluate these initiatives to determine their effectiveness in achieving their desired outcomes of preventing crime and reducing the fear of crime.

The ISUPD's Community Engagement Unit (CEU) has the primary responsibility of building partnerships with the campus community. The CEU has taken intentional steps to not only engage with the community, but to also educate campus members by offering programs such as <u>Allstate's The Law and You</u><sup>21</sup>, a program which teaches students about their rights in police-community encounters. Additionally, the commitment to engaging and educating the community is clearly evident in the training the unit has received, especially in light of pandemic-created obstacles to meeting with people in person. This training includes: PowerPoint presentations training, Verbal Judo<sup>22</sup> de-escalation, and prevention of violence training, as well as training on how to speak to people in public and via ZOOM to engage the campus community in a positive and professional manner.

Sage, the department's newest therapy/comfort dog is a prime example of the department's forward thinking engagement strategy. During almost every interview, faculty, staff and students raved about Sage. Sage was brought up by everyone with whom we spoke as one of the greatest community engagement tools that they had ever experienced. The fact that Sage came to the department after a number of years of negotiation and was acquired through donations has been an added benefit.

<sup>21</sup><u>https://nccpsafety.org/assets/files/</u> library/lawyou.pdf

<sup>22</sup> Jenkins, Verbal Judo: The Gentle Art of Persuasion. New York: William Morrow, 2013. Thompson, George J., and Jerry B Jenkins. Sage has been a conversation starter, linking members of the community to the ISUPD, creating new positive experiences for department members and the campus community. The ISUPD has recognized that presenting themselves through the CEU in a softer fashion with additional uniform modifications, adds to their degree of approachability, making community members feel more at ease when speaking with members of the department.

We commend Chief Woodruff for his progressive community policing approaches. It is clear to us that he understands and welcomes the new and emerging trends in community policing that are quickly shaping the future culture and climate within the department. Chief Woodruff moved the department forward with the development of the Community Engagement Unit (CEU) and motions to the unit's future enhancement in his department's strategic plan.

The Chief's top-down community policing approach serves to remind every member of the department that community engagement efforts are not the sole responsibility of the CEU, but are the responsibility of every officer. Through countless interviews, officers reflected that the Chief continually reminds them that their primary mission is to educate and engage with the campus community. The recent departure of several members of the department who were focused on enforcement efforts and wanted to have these initiatives be a significant part of their daily activities, is direct evidence of the community policing priorities that have been set by the Chief.

Chief Woodruff's leadership style and the manner in which he is impacting the departments culture is in alignment with the Final Report of The President's Task Force on 21st Century Policing<sup>23</sup> mentioned earlier in this report which states: "Community policing should be infused throughout the culture and organizational structure of law enforcement agencies. Community policing must be a way of doing business by an entire police force, not just a specialized unit of that force. Community policing cannot be a program, unit, strategy or tactic. It must be the core principle that lies at the foundation of a police department's culture. The only way to significantly reduce fear, crime, and disorder and then sustain these gains is to leverage the greatest force multiplier: the people of the community."

It remains to be seen if the department's community engagement efforts will be accelerated or hindered with the introduction of body worn cameras. Historically, body cameras have enhanced department transparency and accountability. Through our interviews with many campus safety stakeholders, we believe this to be the case at ISU and feel the introduction of this technology will serve to enhance the department's community engagement efforts.

> <sup>23</sup>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

#### **Recommendations**

- 55. Continue to prioritize finding dedicated office space for the department's community engagement unit.
- 56. In alignment with the department's strategic plan, look to expand the community engagement unit by two additional officers.
- 57. Seek opportunities to enhance the diversity of the members serving in community engagement unit, with a specific focus on gender diversity and members of LGBTQ+ if any of the members of the ISUPD openly identifies with these groups.
- 58. In keeping with the department's strategic plan, consider expanding the department's comfort/therapy dog program.
- 59. Continue to position department members to be able to provide campus wide training in areas such as verbal judo, de-escalation and prevention of violence.
- 60. Obtain and/or utilize/vehicles for the CEU that are not standard patrol vehicles when conducting their community engagement work.
- 61. Consider having an officer from the community engagement unit serve as part of the Inclusive Community Response Team.
- 62. Consider having members of the CEU hold routine open forms designed to solicit input as to how the ISUPD could enhance future community policing and engagement initiatives.

## **Feedback from the Listening Sessions**

Overall, the listening sessions (though sparsely attended with approximately 25 attendees total) provided an opportunity to hear diverse perspectives about the ISU Police Department and individual and collective perspectives regarding the sense of safety on campus. When asked directly about issues related to race and safety on campus, participants described a general sense of safety for everyone on campus, but emphasized the need for the University to address issues of race and racism throughout the institution, as a whole. Some participants described the need for the ISU Police to be more proactive in terms of listening to Black students, faculty, and staff, which we address below.

Staff, faculty, and students alike praised the Department for their work with the campus community and especially sang the praises of "Pawffcer Sage." In general, students, faculty, and staff find the ISU campus to feel safe and if they offered critiques about policing, they directed those at the departments in Normal and Bloomington. One session's participants in particular asked if the ISUPD's jurisdiction could be expanded into the town, as they would rather interact with ISUPD instead of the departments from the surrounding areas. Opportunities for the ISUPD to continue to expand their engagement initiatives arose during these sessions. A few suggestions included: creating more opportunities for students to engage with the ISUPD in terms of their career development, improving the quality and coverage of cameras and blue lights (there is some concern some of these items are in disrepair, and a few participants mentioned that the tunnel area under the Tri Towers feels unsafe), the need for the addition of crossing guards at key intersections, and the need to ensure that events hosted by Black students differentially policed.

A general theme, especially from one listening session, was that ISUPD staff and leadership should "lean-in" to expressions of lived experiences of students, without questioning those experiences. Students described their need to be heard without feeling like their concerns and experiences were being dismissed as a "one-off" or as an impossibility. Some students suggested that representation from Black student leadership on the ISUPD advisory committee would help bridge this gap (we addressed this issue elsewhere in the report). Additionally, students suggested that an annual town hall with the ISUPD could help address these concerns. Further, we received comments related to the need to increase transparency around department training, especially training related to anti-bias, diversity, and de-escalation. Increasing transparency in this area will potentially help foster and maintain trust between the ISUPD and the campus community.

While many participants described campus as relatively safe, others described it as a place where some students, faculty, and staff do not feel like they can safely express their identities. Some participants suggested that concerns related to communities of color on campus have not been addressed for the past nearly two decades and that communities of color feel surveilled by the administration across the institution. These concerns were not directed at the ISUPD, but since they impact the overall sense of safety on campus, we include them here.

#### **Recommendations**

- 63. Assess functionality and area coverage of safety equipment, such as blue lights and security cameras.
- 64. Continue to identify opportunities to partner with the jurisdictions in the surrounding areas in order to create a more student-friendly extended area.
- 65. Identify opportunities to offer internship or other career path options to students interested in pursuing a career in policing.
- 66. Create opportunities to learn from Black students, faculty, and staff on campus (through positions on the advisory board, the provision of a town hall, or other).
- 67. Continue to provide (and potentially expand reach of) information related to the ISUPD trainings (addressed elsewhere in this report).

# SECTION V – MASTER RECOMMENDATION LIST

# **Master List of Recommendations**

## Role, Mission, and Vision

- 1. Consider updating the department's mission and vision statements to include the following concepts:
  - The preservation of life and reduction of harm;
  - Enhanced transparency and accountability;
  - The implementation of procedural justice concepts in both internal and external interactions; and,
  - Sustained engagement with the campus community; rigorous, on-going, and evidence-based training and education.
- 2. Continue to collaborate with internal and external campus safety partners during the future refinement of the department's strategic plan.
- 3. Broadly communicate the department's strategic plan to the campus community and provide annual updates on the department's progress in meeting the plans goals and objectives.
- 4. When fully implemented, seek the guidance of the Police Chief's Advisory Council (PCAC) when developing the department's strategic plan.
- 5. Consider developing a campus safety facility working group to determine future department needs and to assist in identifying state of the art higher education campus safety facilities to help guide future planning initiatives.

# Accountability

- 6. Consider designating a single command level officer, other than the Chief, to manage the departments I/A function.
- 7. Ensure all I/A investigations are conducted by members who are appropriately trained to conduct these investigations and are familiar with the department's I/A policies and procedures.
- 8. Update the department's web page to include a statement that informs the campus community that any and all complaints, including anonymous ones, will be accepted and fully investigated.
- 9. Modify the online complaint form to allow for anonymous submittal of complaints.
- 10. Complete an annual I/A summary and post the summary on the department's website.

- 11. Adopt an early warning policy and process.
- 12. Consider the use of an early warning software platform.
- 13. Eliminate the use of the "acting supervisor" role and ensure a fully trained sergeant or corporal oversees each patrol shift.
- 14. Reconsider the existing department practice of counting shift supervisors as part of the minimum staffing requirement.

#### Transparency

- 15. Gather gender identity, race, and ethnicity demographics for motor vehicle stops, arrests, and uses of force. Share the demographic breakdowns in publicly available department reports, published monthly.
- 16. Broaden the department information/reports shared on ISUPD's website to include the following:
  - a. Reports for the number of motor vehicle stops conducted, arrests made, and uses of force by members of the department;
  - b. Recruiting efforts; and,
  - c. High liability department policies that include: use of force, vehicle pursuits, internal affairs, training, response to a mental health crisis, evidence and property storage, recruiting and hate crimes.
- 17. Consider sharing the gender identity, race, and ethnicity demographics of the ISUPD.
- 18. Continue to highlight the department's transparency initiatives using a variety of social media platforms.
- 19. Once fully developed and implemented, leverage the work of Police Chief's Advisory Council to further build the department's transparency initiatives.
- 20. Ensure information about the CPAC is accessible on the department's website as well on other campus safety related University webpages.
- 21. Stay abreast with the rapidly evolving standards and expectations of advisory and/or external committees.

#### Training and Professional Development

22. Enhance the existing internal training committee to include representatives of the various units and ranks as well as key stakeholders to provide input and recommendations to the chief and deputy chief relative to the annual department-wide in-service training program.

- 23. Provide professional dispatch and crisis communications training to all ISUPD dispatchers. Include dispatch staff in exercises to develop those skills when available.
- 24. Ensure that dispatchers are introduced, virtually or in-person, to key campus partners.
- 25. Ensure all current and future communication center FTOs attend and complete the appropriate certification program.
- 26. Continue with department plans to redesign the Field Training Officer manuals to include the department's mission, role, values, cultural competency, appreciating diversity and inclusion, anti-bias, and other contemporary policing training. Schedule an annual review of these important manuals.
- 27. Review the task and skills list with the training committee and update as needed for all positions in the department.
- 28. Consider amplifying department outreach efforts to include the depth of ISUPD training program and frequency of the department's diversity and inclusion training and experience commitment.
- 29. Explore additional opportunities to participate in joint training and education efforts with University and community stakeholders, including demonstration and hands-on exposure to the use of force simulator.
- 30. Publish an annual report summarizing the department's overall training completed during department sponsored in-service and via external training resources.
- 31. Develop and implement a training program evaluation process, including how the feedback gathered will be reviewed for enhancing department training initiatives.

# Written Directives

- 32. Provide a clear definition of the types of incidents that qualify as "informal complaints," for example, demeanor complaints or civilian misunderstandings of police procedures.
- 33. Remove the "incomplete" definition of citizen complaints. Adjust the policy to state that ISUPD will investigate all complaints to the fullest extent possible even if the complainant becomes unavailable or uncooperative.
- 34. Add language to section 1020.4 stating that all complaints, including anonymous ones, will be accepted and fully investigated.
- 35. Provide clear procedures for notifying the Chief of all complaints.

- 36. Add language specifying what types of allegations require immediate notification of the Chief (i.e., criminal allegations, civil rights violations etc.)
- 37. Specify the types of allegations that may be investigated by first line supervisors and types that must be investigated by the I/A function.
- 38. Specify who will investigate criminal allegations of misconduct.
- 39. Update the policy to specify the pausing of I/A's during a criminal investigation.
- 40. Amend section 1020.7.4 to state that I/A investigations shall be completed within 30 days of the complaint's receipt.
- 41. Add language to section 1020.7.4 to state that the Chief may extend an investigation beyond 30 days due to extenuating circumstances.
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- 43. Add language to section 1020.14.3 specifying exactly how subject officers and complainants will receive notification of complaint dispositions.
- 44. Add language that explicitly bans the use of warning shots.
- 45. Add a use of force continuum such as that provided by the National Institute of Justice.<sup>24</sup>
- 46. Add language requiring the review of all use of force reports by the Deputy Chief.
- 47. Add language requiring entry of all use of force incidents into an early warning system.
- 48. Add language stipulating the creation of an annual statistical summary of use of force incidents that is placed on the department's website.
- 49. Clarify section 467.11 to specify exactly if/how responding officers should coordinate crisis response with Student Counseling Services, University Housing, Dean of Students Office, Student Behavioral Intervention Team, and the Faculty/Staff Care Team.
- 50. Add a list of local mental health resources and procedures for accessing the competencies of these organizations.
- 51. Add language specifying exactly when the Sexual Assault Response Team (SART) should be notified and by whom.
- 52. Add language listing available support resources for victims.
- 53. Utilize "stop card" data to complete a monthly internal analysis to identify trends and patterns that may lead to bias policing allegations.

<sup>24</sup><u>https://nij.ojp.gov/topics/articles/</u> use-force-continuum 54. Utilize "stop card" data to complete a monthly internal analysis to identify trends and patterns that may lead to bias policing allegations.

#### **Community Policing and Engagement**

- 55. Continue to prioritize finding dedicated office space for the department's community engagement unit.
- 56. In alignment with the department's strategic plan, look to expand the community engagement unit by two additional officers.
- 57. Seek opportunities to enhance the diversity of the members serving in community engagement unit, with a specific focus on gender diversity and members of LGBTQ+ if any of the members of the ISUPD openly identifies with these groups.
- 58. In keeping with the department's strategic plan, consider expanding the department's comfort/therapy dog program.
- 59. Continue to position department members to be able to provide campus wide training in areas such as verbal judo, de-escalation and prevention of violence.
- 60. Obtain and/or utilize/vehicles for the CEU that are not standard patrol vehicles when conducting their community engagement work.
- 61. Consider having an officer from the community engagement unit serve as part of the Inclusive Community Response Team.
- 62. Consider having members of the CEU hold routine open forms designed to solicit input as to how the ISUPD could enhance future community policing and engagement initiatives.

## Feedback from the Listening Sessions

- 63. Assess functionality and area coverage of safety equipment, such as blue lights and security cameras.
- 64. Continue to identify opportunities to partner with the jurisdictions in the surrounding areas in order to create a more student-friendly extended area.
- 65. Identify opportunities to offer internships or other career path options to students interested in pursuing a career in policing.
- 66. Create opportunities to learn from Black students, faculty, and staff on campus (through positions on the advisory board, the provision of a town hall, or other).
- 67. Continue to provide (and potentially expand reach of) information related to the ISUPD trainings (addressed elsewhere in this report).

# SECTION VI - ATTACHMENTS

## **Attachment 1: Interview Summary**

- I. Total Number of Days of Virtual Interviews: 9
  - February 25, 2021
  - March 8-11, 2021
  - March 15-18, 2021
- II. Total Number of Interviews Conducted: 21 + Visioning Session
- III. Number of Individuals Interviewed: 40
- **IV. Functional Areas Represented in Interviews:** 
  - Athletics
  - Emergency Management
  - Employee Relations
  - Event Management
  - Facilities
  - General Counsel
  - Human Resources
  - Office of Parking & Transportation
  - Student Affairs
  - Student Affairs Information Technology
  - Student Counseling Services
  - Title IX
  - University Housing Services
  - University Police Department

# V. Total Number of Days of Virtual Campus Focus Groups: 7

- March 8, 9, 11, 2021
- March 16-17, 2021
- March 25, 2021
- March 31, 2021

# VI. Total Number of Virtual Campus Focus Groups Conducted: 8

# VII. Number of Individuals Interviewed: 40

# **VIII.Functional Areas Represented in Interviews:**

- Anti-Black ISU
- Diversity and Inclusion Advisory Council (DIAC)
- Faculty/Staff
- General Student
- Key Informants
- Residential and Wellness Affinity Student Focus

# **Attachment 2: 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 agencies engage

with members of their campus communities.

He serves 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 is currently the Chair of 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.



# ROBERT L. EVANS | MANAGER FOR ORGANIZATIONAL ASSESSMENT AND K12 SERVICES

In March of 2020, Rob Evans was appointed as Director of K-12 Services for Margolis Healy. Rob specializes in safety, security and emergency preparedness for public, private and independent K-12 schools and school districts. Rob's executive law enforcement and military experience provides a unique background to offer clients a wide range of specialized services

that includes, school safety planning, training and exercise support, emergency management consultation, Immediate Action Response Training (IART), Emergency Operations Plan (EOP) development, litigation consultation and special investigations/ independent reviews. Rob has worked with public and private schools across the country to enhance their existing safety and security planning efforts and assist in the development and implementation of future school safety initiatives.

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.



# FRANCIS MOZGAI, CPP | DIRECTOR FOR SECURITY & EMERGENCY MANAGEMENT SERVICES

Mr. Fran Mozgai, CPP joined Margolis Healy in 2018 as the Manager of Security & Emergency Management Services. Prior to joining Margolis Healy, Fran had retired from the Hillsborough Police Department, an accredited law enforcement agency located in Central New Jersey, after serving 25 years. He most recently held the rank of Captain and oversaw the Patrol and

Investigative Divisions. Fran has been in supervisory and command level positions for fourteen years and has supervised a multitude of units at his agency including; community policing, training and internal affairs. He has also been a police academy in-service instructor.

Prior to the advent of school resource officers, Fran was a juvenile officer and worked closely with a large suburban school district on matters concerning school safety and security. Later, as a Detective Lieutenant, he was his agency's liaison to the school district and was the primary collaborator for all matters concerning safety and security at the school district's facilities. In this role, Fran was responsible for coordinating the response to critical incidents such as bomb threats, reports of firearms on campus, K-9 searches, unidentified intruders and large-scale events.

On the emergency management side, Fran has multiple FEMA certifications including; IS-907 "Active Shooter, What You Can Do", and IC 400 "Advanced Incident Command." Fran has received twenty-one medals and commendations throughout his career, including two for his management of his agency's response to Hurricane Irene and Hurricane Sandy. Fran is also board certified in security management as a Certified Protection Professional (CPP) by the American Society for Industrial Security.

Fran holds a Master's Degree from Boston University and a Bachelor's from Moravian College. He is a graduate of the FBI's Law Enforcement Executive Development Seminar and the Rutgers' University Law Enforcement Executive Leadership Program. Fran is a member of the FBI's Law Enforcement Executive Development Association and the American Society for Industrial Security.



### 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<sup>™</sup>, 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.



## 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.





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