# Table of Contents

- **Organization of This Report** ........................................ 2
- **Acknowledgments** .......................................................... 3
- **Disclaimer and Disclosure** .................................................. 4
- **Section I – Methodology** .................................................... 5
  - **Category I: Organizational Culture Assessment** .................. 5
    - Strategy ........................................................................ 6
    - Methodology................................................................. 7
  - **Category II: Benchmarking Analysis** ............................... 8
    - Documents Requested.................................................... 8
- **Section II – General Observations** ..................................... 10
- **Section III – Specific Observations** ..................................... 20
  - **Organizational Structure & Governance** ......................... 20
  - **Policies & Procedures** .................................................. 25
  - **Reporting & Metrics** ..................................................... 29
  - **Human Capital & Skills** ................................................ 34
- **Section IV - Benchmarking Results** .................................... 40
  - Methodology ................................................................. 40
- **Section V – Visioning Exercise** ......................................... 49
- **Section VI – Recommendations** ......................................... 54
- **Section VII – Firm Description & Qualifications** ................ 62
  - **The MHA Methodology** ............................................... 64
  - **The MHA Project Team** ............................................... 66
This report is presented in a chapter format with seven major sections. Section I describes the Methodology for this assessment. Section II presents General Observations that outline overall impressions and themes. Section III provides insight into Specific Observations and details emerging from research and analysis. Section IV contains the results of the benchmarking research and analysis. Section V is the visioning exercise report, and Section VI is the list of recommendations. Section VII includes reference materials on the firm and the team assigned to the engagement.
ACKNOWLEDGMENTS

Margolis Healy & Associates acknowledges the assistance and guidance of Laurita Thomas, Associate Vice President for Human Resources; Fred White, Project Manager; and Kathleen Donohoe, Associate Director of Human Resources, who served as our combined primary liaisons for this project. We extend a special appreciation to the members of the Steering Committee who provided sound directional advice as we conducted our assessment. We thank the various members of The University of Michigan community who participated in our assessment. Without exception, everyone was welcoming, forthcoming and honest in his or her opinions and thoughts. The University of Michigan community was a gracious host.
DISCLAIMER AND DISCLOSURE

Margolis Healy & Associates conducted this assessment and prepared this report at the request of The University of Michigan. The authors’ opinions, findings, conclusions, and recommendations are provided solely for the use and benefit of The University of Michigan. Any warranties (expressed and/or implied) are specifically disclaimed. Any statements, allegations, and recommendations in this report should not be construed as a governing policy or decision unless so designated by other documentation. The report is based on the most accurate data gathered and available to Margolis Healy & Associates at the time of the assessment and presentation, and therefore is subject to change without notice.
Margolis Healy & Associates was engaged by the University of Michigan to conduct an organizational culture assessment and benchmarking study to better understand the working relationship of the three primary public safety organizations serving the University of Michigan community: The Department of Public Safety (DPS), The Hospitals & Health Centers Security Department (HHC-Security), and the Housing Security Department.

The review team consisted of Team Leader MHA Managing Partner Gary J. Margolis, MHA Associates Aaron Graves, Thomas Tremblay, Anthony Purcell, Joseph Forte, Stacey Miller, Penny Shtull and Research Assistant Katherine Forman. The majority of the team visited the campus in April 2012. During the site visit, we reviewed the areas under consideration and conducted interviews in a mix of one-on-one and forum sessions that included leadership from the various public safety departments, institutional offices, administrative units, and selected members of the University’s leadership team. In addition, a review of the university and unit policies, operating procedures and other materials occurred, as did an analysis of the management, organization, planning, coordination and supervision of work within the three organizations. Finally, a benchmarking study of peer institutions provided useful comparisons.

The information contained herein serves three general audiences and purposes. First, the research and findings are organized to provide University leadership with a concise set of actionable items. Second, leadership can use the detailed information found in the observations to understand specific areas of structure, policy and practice they should consider and address. Third, an executive summary gives the general campus community an understanding of the orientation and functional success of the University and the departments germane to the study in relation to the outcomes of this review.

**CATEGORY I: ORGANIZATIONAL CULTURE ASSESSMENT**

In accordance with the institution’s wishes, we conducted a comprehensive assessment of the working relationship and operating protocols between HHC-Security (non-sworn), the Department of Public Safety (sworn), Housing Security (non-sworn) and the units with whom they interact regularly, in order to address cultural and management issues that arose in the course of an internal review.
Specific to our services for the University of Michigan and the HHC-Security, DPS, and Housing Security organizations, we evaluated the core areas as outlined in order to:

- Establish a baseline for the gap analysis between current and ideal practices.
- Develop an understanding of current operational cultures in and across the three safety and security organizations.

Our assessment included the alignment of leadership practices and orientation to operations. We synthesized the data gathered through research, interviews and assessment, and formulated an analysis that draws from reasonable, acceptable, best and promising practices in campus public safety. We acknowledge areas in which the University and departments are meeting or exceeding expectations and, through a gap analysis, we make observations, actionable recommendations and suggestions for change, as needed. The assessment, in concert with staff, was an iterative process, considering factors such as the degree of risk, practicality, cost, disruption to campus life and the educational research and healthcare mission and goals of the University.

STRATEGY

Our approach to the organizational culture assessment for the University of Michigan, and to our management studies in general, includes an examination of the following core areas:

1. **Operations & Written Directives** - It is essential for a campus public safety organization to have a formal written directive system to provide direction, structure and organization. MHA turns to the Commission on Accreditation for Law Enforcement Agencies (CALEA) for internationally accepted practices in law enforcement operations and campus public safety management. CALEA accredits municipal, state, federal, university/college, railroad, airport, transit authority and other law enforcement and security operations; training academies; and communication centers in the United States, Canada and Mexico. MHA turns to the Joint Commission with regard to healthcare safety and security for relevant standards and unique recommendations that augment accepted practices in campus public safety.
2. **Agency Orientation (internal)** - We assess and evaluate the strength and effectiveness of the connection between the public safety organizations and their reporting structures. This analysis for the University of Michigan includes the organizational structure (bureaucracy and hierarchy); participation in decision making; conflict management; learning, innovation and risk taking; and factors driving attitudes toward collaboration across the three units. We will assess the organizations’ relationships with key campus stakeholders, including the Office of the General Counsel, the Office of Clinical Affairs, Health System Risk Management, Risk Management, the Health Systems Compliance Office, the Office of Emergency Preparedness, and Occupational Safety and Environmental Health.

3. **Agency Orientation (external)** - We assess and evaluate the strength and effectiveness of the connection between the public safety organizations and local, state and federal law enforcement; the prosecutor’s office; and advocacy organizations, as applicable and germane to the assessment.

4. **Student & Community Involvement** - We assess the effectiveness and appropriateness of student and community involvement in the public safety functions for the campus.

**METHODOLOGY**

1. **Multi-day site visit** (April 9 - 12, 2012)

2. **Interview of public safety employees in the three organizations** representing various ranks and assignments; selected institutional employees (identified by the University), leaders, and local law enforcement officials to get an accurate view of internal and external expectations, perceptions and realities of the public safety organization and the services it provides;

3. **Analysis of the management, organization, planning, coordination, and supervision of work** within the three public safety organizations including the planning, direction and supervision, internal inspection and control, internal/external communications, policy development and application; number, type, and purpose of internal organizational units and the number and type of personnel and resources allocated to them;
4. **Research relationships between the public safety organization and institutional officials;** other institutional departments; campus organizations; and local court, law enforcement and criminal justice agencies with which it regularly interacts. We are interested in how the organizations collaborate on common issues; resolve conflict; etc.

5. **Conduct a visioning workshop on the future of public safety services at the University of Michigan.** Participants include, but are not limited to, the leadership of HHC-Security, DPS, and Housing Security; representatives from the Michigan Assembly, University Senate, and equivalent staff leadership; representatives from the organizational units to whom the three public safety organizations report (Business & Finance, Student Affairs, Health System CFO); institutional leadership, etc.

**CATEGORY II: BENCHMARKING ANALYSIS**

In accordance with the institution’s wishes, we conducted a benchmarking study of peer/aspirant institutions identified collaboratively with the University. Our benchmark instrument included the following data points:

- Organizational structure/reporting relationship, as well as the benefits and complications of such relationships;
- Size, demographics and budgets;
- A summary of key provisions of standard operating procedures/policies at other campuses as they relate to communications and incidents reporting across public safety units on a campus;
- Police interactions with medical centers and student housing facilities;
- Specific issues related to medical centers, such as drug diversion;

**DOCUMENTS REQUESTED**

The following documents were requested and provided, among others.

1. Written directives, operating procedures, manuals and related information from the three organizations (HHC-Security, DPS, Housing Security);
2. General policies, protocols and procedures related to campus safety and security;

3. Current budget and last year’s budget;

4. Copies of applicable security contracts;

5. The institution’s last three Annual Security Reports (ASR) and crime data for the campus and surrounding community;

6. Memorandum of Understanding between the organizations as well as with surrounding police, public safety agencies and institutions of higher education;

7. Prior studies and related reports;

8. Strategic planning and visioning documents.
SECTION II – GENERAL OBSERVATIONS

Margolis Healy & Associates was engaged by the University of Michigan to conduct an organizational culture assessment and benchmarking study to better understand the working relationship of the three primary public safety organizations serving the University of Michigan community: The Department of Public Safety (DPS), The Hospitals & Health Centers Security Department (HHC-Security), and the Housing Security Department.

Research was conducted through interviews and site visits with university leadership, and staff members within the units and related campus offices. In addition, a review of the university and unit policies, operating procedures and other materials occurred, as did an analysis of the management, organization, planning, coordination and supervision of work within the three organizations. Finally, a benchmarking study of peer institutions provided useful comparisons.

The research and analysis produced the following findings:

- The three departments are well-run, professional and efficient organizations, committed to their areas of responsibility and recognized for their accomplishments amongst their peers.

- There is no formal and insufficient informal connection between the three resulting in significant lack of coordination, misunderstanding of roles and responsibilities, confusion on the part of the university community they serve and significant mistrust between DPS and HHC-Security, specifically.

- There is a commitment to create a safe and secure environment among the three groups, but a lack of a shared vision regarding what that means.

- The University of Michigan is the only institution in our benchmarking analysis to have a separate, professionally staffed housing security function reporting through a division of student affairs. While there was a broader range for health system security, there is consistency in having the hospital security function organizationally linked to the police/public safety function.

The institution’s leaders have committed to resolving issues and removing barriers that exist, enabling them to create a positive safety and security culture across campus. We believe the recommendations we put forth will help them achieve that cultural change.
HHC- Security

The University of Michigan Hospitals and Health Centers Security & Entrance Services Department (HHC-Security), comprised of more than 200 employees, is a well-organized and professional security operation. The Department is led by a director and a command staff consisting of one captain, seven lieutenants, eight sergeants, one entrance services manager and one security screeners' manager. HHC-Security employees are professional and highly trained with several having earned the distinction of advanced certification in the security field. Nine employees are Certified Healthcare Protection Administrators (CHPA); four are Certified Protection Professionals (CPP); and one is a Physical Security Professional (PSA). It is clear that HHC-Security staff are dedicated and committed to providing the University of Michigan Hospitals and Health Centers with unparalleled safety and security services.

HHC-Security is visible on foot or on mobile patrols throughout the Hospitals and Health Centers deploying a combination of uniformed officers and plain-clothes guest services personnel. The Department is responsible for educational services related to safety and security, and dispatching emergency and non-emergency calls for assistance within the Health System. Located in the Facilities Control Center (FCC), HHC-Security communicators receive and dispatch emergency (9-1-1) and routine calls for service and monitor security cameras and the card access control system. We are impressed with their use of modern security technology.

The written directive system for HHC-Security is well developed and thorough. The policies we reviewed were clear, concise and easy to comprehend. The security management plan is a model document and covers the required standards set forth by the Joint Commission on the Accreditation for Healthcare Organizations (JCAHO). Policies and procedures exist for fire alarm response and there are protocols for all Hospitals and Health Centers buildings. The HHC-Security written directive system includes comprehensive policies and procedures on a number of areas germane to the safety and security of a medical facility.

Department of Public Safety

The Department of Public Safety is a full service law enforcement agency providing police services to the university community; a 9-1-1 Public Safety Answering Point (PSAP) and Communications Center; and
Campus Parking Enforcement & Management services. The organization’s staffing complement includes 54 sworn law enforcement officers licensed by the Michigan Commission on Law Enforcement Standards. There are 37 non-sworn employees in the Department including a communications/dispac dispatch specialist, Parking Enforcement officers and administrative and technical support staff positions. The Department is granted its authority to enforce the laws of the State of Michigan and the rules and ordinances of the University through Michigan Public Act 120 of 1990 and Act 80 of 1905, and the Regents of the University of Michigan. The Department, which serves the Ann Arbor Campus, is commanded by the Chief of Public Safety/Police who reports through the Associate Vice President for Facilities and Operations and ultimately to the Executive Vice President for Administration and Finance. The staff has achieved certification and licensure in their areas of expertise, and advanced training and recognition where applicable (e.g., FBI National Academy and related advanced schools).

The Department is currently operating under the direction of an interim Chief of Public Safety, and has not had stable fulltime leadership in a number of years. The Department is internationally accredited and recognized by the Commission on Accreditation for Law Enforcement Agencies (CALEA; www.calea.org). CALEA is the gold standard in public safety accreditation and accredits police departments, campus public safety organizations, dispatch centers, and training academies in the United States, Canada and Mexico. As such, its written directives, and many of its policies and procedures meet international standards for law enforcement services.

Given the authority granted to the Department of Public Safety by the State of Michigan and the Board of Regents, we hold the organization to a different set of expectations. DPS is the only entity within the University of Michigan that deploys lethal force tools and which possesses the legal authority to seize human life and freedom - both Constitutional guarantees. While Housing Security's obligations end at the door of the residential facility, and HHC-Security's once one leaves the hospitals, DPS's responsibility is for the safety of all people visiting, attending or working at the University of Michigan.
**Housing Security**

Housing Security was established 41 years ago and is one of the oldest and most established residentially based security programs in the country. It is comprised of a director of Housing Security, two associate directors for Housing Security and daily operations, four shift supervisors, thirty-two officers, and two access control professionals. They are a uniformed but unarmed security force whose primary responsibilities include, but are not limited to, mobile/foot patrol of nineteen residence halls and five apartment complexes; access control to all residential and apartment spaces; oversight of the residential security camera system; coordination of student move-in/out (traffic control); oversight of all residential fire safety functions (i.e. monitoring and inspections, etc.); ongoing proactive educational programming related to personal and community safety and security; and playing a role in the student conduct processes related to incidents in housing.

**Organizational Structure**

There is no formal organizational connection between the three security functions. The Director of Security for HHC reports to the Associate Director of Operations within the Hospitals and Health Centers, eventually answering to the President of the University through the Executive Vice President for Medical Affairs, Dr. Ora Hirsch Pescovitz. The Chief of Police reports to an Associate Vice President for Facilities & Operations who reports through to the Executive Vice President and Chief Financial Officer Timothy P. Slottow. The Director of Housing Security reports to a Director of Housing who reports to an Associate Vice President for Student Affairs who reports to the Vice President for Student Affairs, Dr. E. Royster Harper. Many of those we interviewed believe the separate reporting lines contribute to inefficiency and current/historical organizational and cultural challenges. Some of the staff said there is a lack of consistency about the directors’ performance expectations from the direct supervisors. The three entities operate under the public safety umbrella for the University of Michigan yet their organizational structures create an independence and lack of coordination that has not been overcome by collaboration and partnerships, even among Department leadership. Our observations are consistent with past studies and findings in earlier reports we reviewed. Interviewees used the specific phrase “a culture of fear and blame,” to describe the ongoing issues between the DPS, HHC-Security and, in small part, Housing Security.
The relationship issues center on a lack of trust and poor collaboration between HHC-Security and DPS, and are less problematic with Housing Security. However, the direction and control of all security functions are negatively impacted under current conditions. These disconnects are centered around protocols for the reporting and investigations of crimes occurring within HHC; the leadership turnover in DPS; the chain of command’s ongoing struggle to correct matters; the hostility, in general, between DPS and HHC-Security; and concerns with the hospital’s FCC call center, discussed later in this report. We perceived a significant orientation of the Department of Public Safety towards a law enforcement-centered approach to its services. The Department performs more like a traditional, old-style police agency than most municipal, county and state police agencies, and to the apparent detriment of its working relationship with HHC-Security and Housing Security, and their respective communities. The lack of a healthy working relationship between the three organizations contributes to confusion, misunderstanding, miscommunication, a lack of trust and respect, a lack of sharing of information, and a failure to recognize and appreciate the role, duties and responsibilities that each department must perform. The Department of Public Safety is focused more on law enforcement, criminal interdiction and arrests than on a broader role as steward of the safety and security of the campus.

We could find no specific reference explaining why the relationships with DPS deteriorated, or if it was ever healthy. Some speculate that the relationships soured when DPS became a full service law enforcement agency in 1990 and believe this change brought about a new culture in DPS. Housing staff said they have a positive relationship with the Department of Public Safety. There is little day-to-day, operational interaction between Housing Security and HHC-Security. Housing Security is clear in its mission to serve the students and staff knows that they do not exist solely to enforce policies. As expected, we heard much about the importance of establishing a sense of community in the residence halls and the importance of building relationships. Towards this end, Housing Security is an important part of the overall residential experience. Residential assistants resonate with this mission and believe that Housing Security officers are competent and committed to their role.

Interviewees shared their belief that it is unrealistic to expect the directors of each of the three public safety units to resolve the long-standing and historical issues alone, and said that they require clear direction and motivation from their immediate supervisors. Many pointed
to a lack of clear expectations for a common vision/philosophy about safety and security for the University community. We heard that ongoing and repetitive conflicts have perpetuated the difficult relationship between the three units and their ability to communicate and collaborate effectively.

We interviewed many in Student Affairs who spoke highly of a strong, healthy partnership between DPS and Housing Security, but who felt that the Division of Student Affairs doesn’t generally view the Department of Public Safety as a partner in the safety and security of the residence halls. Student Affairs staff value the role of DPS on campus but at an arm’s length from non-emergency or non-criminal needs. DPS is seen as an external resource, much the way Ann Arbor Police might be viewed. One comment, “we don’t need or want police in the buildings… no guns patrolling the hallways,” struck us as indicative that this partnership does not exist. This was confirmed during interviews with student residence hall staff who appeared confused about the difference between the Department of Public Safety, Housing Security, and to a lesser extent, HHC-Security. One in three of the resident advisors we spoke to understood the difference between DPS and Housing Security. One in ten did not know that the University of Michigan has its own police department and assumed the Ann Arbor Police Department respond to law enforcement and emergency needs in the residence halls. While we recognize that this also means that nine out of ten did understand that the University has its own police department, our concerns still exist. Arguably, this group of students is the gateway to many resources and needs of residential students such that they would need to firmly understand such a basic support service as public safety. Students expressed their perception that DPS spends little time, if any, working proactively with Housing Security in the residence halls. Some of this confusion may be the result of shared dispatch services. Residential assistants call DPS for all safety and security needs, and DPS dispatchers determine whether to send a police officer or a housing security officer depending on the nature of the call. In this regard, students told us that they appreciate having Housing Security in order to avoid a police response for every call for service. Having said this, residential assistants communicated the need for clarification. The Department of Public Safety does not appear to be systematically involved in proactive safety and crime prevention efforts for the residential community.

The overall perception of safety and security at the Hospitals and Health Centers among those we interviewed (HHC) is positive. Comments on the response time, dedication, commitment and professionalism of
HHC-Security were outstanding. Information gathered from hospital staff confirms the overall satisfaction with services provided by HHC-Security. Staff relies on HHC-Security to triage incidents and determine the need for DPS involvement. One staff member stated that “[we] would never go around HHC-Security to get to DPS… [We] wouldn’t know who to call.” A number of HHC staff shared positive opinions of HHC-Security, and many thought that DPS comes across as pushy and intimidating. Among those we interviewed, DPS was not generally viewed as respectful of the hospital environment. We believe this contributes at times to a difficult work environment (e.g., threatening obstruction of justice charges and being heavy handed). We consistently heard that the average health care practitioner fears interacting with DPS because of their tactics. One often cited example, for instance, is the story of the HHC risk manager who was threatened with criminal charges while seeking advice from legal counsel to evaluate a release of information.

HHC-Security has established an excellent reputation by creating and implementing crime prevention programs and response units within the hospitals and health centers (e.g., a Loss Prevention Unit, Workplace Violence Prevention Program, a Physical Management Program, a Rapid Response Team, a Safety Review Team, and a Behavioral Response Team). HHC-Security appears to be a valued member of the health care team servicing the needs of patients, families and visitors.

We were made aware of the incidents that contributed to the relationship strain between DPS and HHC-Security (e.g., the delayed reporting of the Jensen case; and instances of alleged heavy handedness around warrant issues). Based in part on interviews with medical staff, these incidents contribute to a fear of DPS by some medical staff (e.g., “this badge and gun give me the right to ask anyone questions,” and examples of university police officers threatening to arrest HHC employees on obstruction of justice charges). Some HHC-Security interviewed perceives a negative attitude by DPS during interactions with patients, staff and visitors. HHC-Security is strongly aligned with patient and customer service and satisfaction, and as such, does not tolerate negative attitudes towards patients, guests, and visitors. We heard there is a pervasive belief that DPS does not understand the security mission of the hospital and health care system, or how HHC-Security operates in furtherance of this mission. “We are always under attack by DPS and we do not know why,” many of the interviewees told us. “They do not look at us as a valuable resource/partner.”
Staff we interviewed from the General Counsel’s Office, Risk Management, and other administrative functions expressed consistent surprise at the level of animosity between HHC-Security and the Department of Public Safety. One particular interviewee with a perspective into both organizations shared the belief that HHC-Security does not want to be accountable to DPS or have DPS involved in their “business.” At the same time, they articulated a belief that DPS is suspicious of HHC-Security; doesn’t respect its role; and ignores health care laws. It is apparent when DPS struggles to abide by the rules and regulations of the hospitals and health care system (e.g., by carrying weapons into the lock down ward in the psychiatric unit).

Many of those we interviewed believed that the cause for these challenges is a pervasive lack of leadership: “The fact is that leadership allows this to happen... what we permit we promote.” Whether it is accurate or not, some people we interviewed perceive DPS as lacking a working knowledge of laws that surround medical privacy and this is seen as a fundamental failure on DPS’s part. By their own admission, police investigators we interviewed agreed with this.

Staff expressed frustration that many committees have been convened and reports issued over the years that highlight these problems, but nothing has changed or been done to address the problems. Department leadership clearly needs to work together across organizations, but hasn’t been able to do so to date. Several of the HHC-Security staff stated that the DPS Chief’s position keeps turning over and there is no permanent stability and leadership, which presents a challenge when trying to maintain a cooperative, trustworthy and respectful relationship. DPS staff point to the leadership in HHC-Security and their perception that jealousy and egos are at the root of the problem. Housing Security, which maintains a positive relationship with its counterparts, doesn’t want to become collateral damage in the struggles between the two organizations.

The Department of Public Safety, HHC-Security, and Housing Security all use the moniker “Public Safety,” causing confusion for our team, and from what we were told, for students, faculty, staff, patients, visitors and guests. In the hospitals and health care system, people seeking help often believe that they are speaking with, or calling, the police (DPS) only to realize later that they are or were speaking to or calling a security officer (either HHC-Security or Housing Security). Their service expectations are therefore, according to HHC and DPS staff, sometimes unmet (e.g., their
belief that they are filing a police report for crime or insurance purposes when they are actually filing a loss control report). “Public Safety” is on the vehicles driven by staff in each separate department and on the patch and badge of each department’s uniforms. The HHC-Security Web site lists Director Hollier as an Associate Director of Public Safety presumably having a reporting line to the Director of Public Safety (Chief of Police) but this is not the case. The use of the emergency number 9-1-1 by both DPS and HHC-Security to contact their respective departments adds to the confusion. The use of the term “public safety” by three different departments with three different organizational reporting structures presents a problem. This issue has been raised in past task force and committee reports but has not been addressed.

According to data gathered in the benchmarking analysis, it is common to have DPS report through the finance and administration function of the institution. Seven out of eight of the institutions surveyed have this reporting structure for their law enforcement organizations. The University of Michigan is the only institution in our benchmarking analysis to have a separate, professionally-staffed housing security function reporting through a division of student affairs. Most of the institutions surveyed rely on their campus police functions to address safety needs in the residential facilities. One of the institutions employs contracted security to perform this function, and another relies primarily on students.

The range is a bit broader for health system security. Several of the institutions have their hospital security function report through the equivalent of a department of public safety, which reports to a vice president and/or chief financial officer position. One institution assigns a sergeant to act as the hospital security liaison to the police department. While the institutions vary, there is consistency in having the hospital security function organizationally linked to the police/public safety function.

Finally, some of the inconsistent understanding of laws affecting healthcare privacy, law enforcement and access to student records may be addressed through meetings involving the attorneys in the Office of the General Counsel that support these areas.

Since our campus visit, the University of Michigan Safety & Security Steering Committee has issued a Draft Report on the Status of Management Response to the Audit (September 2012). This report outlines several areas where the University has taken substantive steps to address areas of concern brought to light by Audit Services and by our work to date. Where
applicable, their efforts are highlighted in this report. The University is to be commended for its commitment to rigorously addressing all concerns raised in a timely, efficient and effective manner, and in advance of finalizing our work.
SECTION III – SPECIFIC OBSERVATIONS

We conducted our assessment and benchmarking research using acceptable, promising and reasonable practices in campus public safety. We examined areas in which the three public safety organizations met expectations or excelled, and areas where this was not the case. This section is divided into four areas: Organizational Structure & Governance, Reporting & Metrics, Policies & Procedures, & Human Capital & Skills.

ORGANIZATIONAL STRUCTURE & GOVERNANCE

HHC-Security

The Hospitals and Health Centers – Security Department (HHC-Security) is structured to meet the duties and responsibilities expected and required of them by the Hospital and Health Care System. The Security Director reports to the Associate Director of Operations and Support Services who reports to the Executive Director and Chief Operations Officer of the Hospital, and ultimately to the UMHS Chief Executive Officer before reaching the President of the University of Michigan. Formal lines of authority are clearly communicated within the organization and each employee is accountable to only one supervisor. The organizational chart is made available to all personnel and it is reviewed and updated by the security director as needed. In draft documents/memoranda, HHC-Security is positioned as the first responder for emergency and non-emergency security, police and fire situations throughout the Health System. HHC-Security is vested with this responsibility by way of UMHS policy and procedures, which state that the HHC-Security Facilities Control Center (FCC) receives all emergency (9-1-1) and non-emergency calls for assistance throughout the Health System. The HHC-Security FCC then determines the necessary response and dispatches responders, as warranted.

Department of Public Safety (DPS)

The University of Michigan’s Department of Public Safety (DPS) is a full service law enforcement agency employing 54 sworn law enforcement officers licensed by the Michigan Commission on Law Enforcement Standards. There are 37 non-sworn employees of the department including a communications/dispatch specialist, parking enforcement officers and administrative and technical support staff positions.

The Department is granted its authority to enforce the laws of the State of Michigan and the rules and ordinance of the University through...
Michigan Public Act 120 of 1990 and Act 80 of 1905, and the Regents of the University of Michigan. The department, which serves the Ann Arbor Campus, is commanded by the Chief of Public Safety/Police who reports through the Associate Vice President for Facilities and Operations and ultimately to the Executive Vice President for Administration & Finance.

DPS underwent reorganization as of July 1, 2012, “as part of [its] ongoing efforts to enhance [its] operations, increase [its] efficiencies to assist with budget constraints and meet [its] customer expectations....” Functions involving payroll/timekeeping, human resources, training, travel, P-Card activity, procurement and financial statement reconciliation became part of a Facilities & Operations centralized administrative support unit. Interim Chief Piersante eliminated three (3) positions (deputy director for staff operations, payroll clerk and accounting clerk senior) at an expected savings of $230,000.

Under the new organizational structure, the chief of police oversees a community policing command (formerly Field Services Bureau) supervised by a deputy chief (acting); a criminal investigations unit, communications unit and emergency management & planning unit, each led by a lieutenant; and a technical and support services group managed by an IT planning manager. The chief is assisted by an executive/senior secretary. Functional responsibilities of the office of the chief include:

- Administrative oversight of all bureaus;
- Primary authority for budget matters; and
- External relationships, such as board and committee involvement or membership.

The internal organizational structure of the Department appears to adequately facilitate the resources and capabilities to meet the existing needs of internal and external University customers. The basic principles of organizing by function, unity of command and accountability, delineating responsibility, reporting, and supervisory accountability are reflected in the Department’s Policy and Procedures Order 1.16, Organization Structure and Functions, and are generally practiced as outlined in the document.

The Department of Public Safety’s mission statement is “To contribute to and promote a safe and secure community, while respecting the rights and dignity of all persons utilizing facilities and programs of the University of Michigan.” The structural dynamics and lack of greater coordination
and collaboration towards shared goals between the three organizations (DPS, HHC-Security and Housing Security) is the key source of conflict and inefficiency between the day-to-day operations of each entity, and the perception of their effectiveness in the eyes of internal and external customers. Many we interviewed shared that the coordination and collaboration issues are the result of a lack of accountability by supervisors at all DPS levels in dealing with conflict with HHC-Security. The same level of tension and conflict does not appear to exist between DPS and Housing Security. Conflicts articulated by nearly all DPS staff interviewed focused mainly on issues, real or perceived, that they believe hamper the working relationship with HHC-Security.

The failure to correct misperceptions, and clarify and codify policies and procedures to address these long standing concerns unique to the working relationship between HHC-Security and DPS is perceived by DPS staff as a failure of leadership at multiple levels. The relationship and coordination between DPS and Housing Security is perceived to be professional and effective in meeting the needs of the residential community.

Regarding the issue of firearms in the hospital environment, DPS officers do not appear to accurately understand the rules and regulations that the hospital must follow in accordance with its accreditation status. On the other hand, if the concern that hospital administration is responsible for the firearms policy beyond its accreditation mandates is accurate, then hospital administrators themselves may not appreciate how a well-trained and armed police service cares for their needs. The overall perception in DPS of an umbrella policy that DPS officers are not allowed to carry firearms in the hospital is problematic, and inaccurate. Too much emphasis has been placed on firearms, with little discussion of the underlying issue – the tension and lack of trust between DPS and HHC-Security front line staff.

Student Housing Security

Student Housing Security at the University of Michigan is amongst the largest, and oldest (41 years) residentially based housing programs in the nation; serving approximately 12,000 undergraduate and graduate students in traditional residence halls, suites, and apartment style housing. University Housing encompasses the functional units of residential education (i.e. resident assistants (RAs), graduate staff and full-time live-in professional staff), facilities, assignments, creative services (i.e.
marketing), technology, communications, conference services, dining services, the housing office of student conflict resolution (HOSCR), and housing security.

The organization is comprised of a director of Housing Security; two associate directors for housing security and daily operations; four shift supervisors; thirty-two non-sworn, unarmed officers; and two access control professionals. Primary responsibilities include, but are not limited to the following:

- Mobile/foot patrol of nineteen residence halls and five apartment complexes
- Access control to all residential and apartment spaces
- Oversight of the residential security camera system
- Coordination of student move-in/out (traffic control)
- Oversight of all residential fire safety functions (i.e. monitoring and inspections etc.)
- Ongoing proactive educational programming related to personal and community safety and security and,

- Playing a role in the student conduct processes related to incidents in housing

The University of Michigan Housings Security works diligently to establish positive living and learning environments, which is reflected in their student affairs-minded mission “to provide a safe and secure environment so that all students are comfortable to live, learn and flourish.” They have received favorable feedback on University Housing’s annual survey with students noting high levels of satisfaction with personal and community safety. In addition, and when asked to specifically comment on the overall performance of the Housing Security unit, colleagues external to University Housing rated their performance as high, and emphasized their respect and trust for the Housing Security team.

Housing Security leadership, supervisors, and officers, not only see themselves as an integral and valuable part of the University Housing Department, but also clearly understand their role as a support function to the University’s sworn and fully accredited Department of Public Safety (DPS). Housing Security staff understands they are not DPS (e.g., the police), nor do they aspire to be, but understand their role to complement
DPS and Residential Education staff members (i.e. RAs and professional live-in staff). Housing Security staff spoke repeatedly about the need to constantly communicate their role and responsibilities to residential students, many of whom do not know or understand the difference between Housing Security and DPS. To students, Housing Security and DPS are one in the same, as they operate seamlessly during minor and critical incidents. Housing Security understands its role of passive enforcement through community outreach, focused on individual and community safety. It sees its primary responsibility as being the professional balance between residential staff members (RAs/RDs) and DPS, specifically when dealing with difficult and/or problematic students and community members. The staff have a keen sense for when situations are irresolvable through their trained methods of intervention and mediation, and are comfortable calling DPS when situations are beyond their scope of capability or professional jurisdiction. Almost all staff members interviewed spoke of Housing Security’s deference to DPS once they arrive on the scene, and how they continue to serve in a support capacity controlling access to and from the scene and/or managing student concerns during an incident or community crisis.

Student affairs leadership expressed, in general, the absence of a shared overall vision for public safety at the University of Michigan by DPS, Housing and HHC-Security, or alignment about how the three safety and security units work together. HHC-Security and DPS are protective of their respective areas of responsibility, and as a result may struggle to move beyond their points of view to address the tension and mistrust between them. We heard from staff that HHC-Security and DPS must spend productive time together discussing concerns, seeking solutions, and refocusing their energy on a shared vision. The solution, in their eyes, is a combination of leadership, vision and structure. According to documents provided by the University, the primary goal of DPS and HHC-Security is to provide the highest quality public safety service to the community. Yet, there is a lack of consistent commitment to cooperation and collaboration between the two organizations. It is clear there are distinct differences in the philosophical orientation of each and significant differences in the tact, approach and manner in which each conducts business. There appears to be a systemic lack of mutual respect and appreciation. While Housing Security is clear about its mission, roles, and responsibilities, overall, Housing Security staff interviewed view the other two divisions as not being as clear about their mission, roles and responsibilities and this continued disconnect impacts
their ability to serve students. This may be more a function of alignment as opposed to an absence of clarity.

**POLICIES & PROCEDURES**

HHC-Security has a well-organized written directive system. Its policies and procedures are clear, concise and easy to comprehend. Each policy is numbered and dated to indicate the effective date of the policy or a revision to the policy. Its mission and goal statements are embedded in its *Security Management Plan*.

*Mission Statement* – “We are dedicated to maintaining and promoting a safe and secure environment in our diverse community. To care for, assist and serve our patients, visitors and staff with compassion, respect, integrity and professionalism.”

*Goals Statement* – “The overall goal of the Security Management Program is to provide a comprehensive protection system that includes appropriate security staffing and security technology including CCTV, alarms, panic switches, access control devices, and physical barriers and hardware. The program also includes the involvement of UMHHC employees, with the combined purpose of providing optimized safety and security for patients and their families, visitors, physicians, volunteers and employees.”

HHC-Security’s *Security Management Plan* complies with the Joint Commission on Accreditation for Healthcare Organizations (JCAHO) 2012 standards for the University of Michigan Hospitals and Health Centers System. At a minimum, the *Security Management Plan* (SMP) is reviewed and revised annually. The HHC-Security director and/or designee are members of the UMHCC Environment of Care (EOC) Committee, the UMHHC Disaster Committee, the UMHHC Emergency Management Committee and the Emergency Umbrella Leadership Group. Specifically, the *Security Management Plan* addresses the Management of the Environment of Care (EOC) standards; infant/child protective system; security monitoring and access control; and dangerous weapons. While the organization has thorough and well-documented accredited policies and procedures, we could find no documents that formalize communication and collaboration with the Department of Public Safety.
The Department of Public Safety has a robust and contemporary written directive system comprised of policies, procedures, rules and regulations for the purpose of:

- Making a broad statement of the Department’s mission, values, principles or goals;
- Providing employees with standardized procedures for carrying out Department activities;
- Providing employees with a set of specific guidelines, rules, or regulations for conduct to which employees must adhere; and
- Providing employees temporary directives to meet special needs.

The Department operates under the University of Michigan’s Standard Practice Guides (SPG) 510.1 dated 12/1/89, and 510.2 dated 6/29/92. These guides serve to appropriately establish the mission, functions and role of the Department of Public Safety within the University’s context. They should and could serve as a framework for the coordination of standards and practices between the three public safety and security units. Approval authority for DPS policies rests with the Chief of Police and the approval of a standard practice guide (SPG) related to DPS rests with the Associate Vice President for Facilities and Operations. The SPG approval process vests appropriate control and influence at the Associate Vice President or Division level to ensure many of the necessary changes and recommendations are carried forth. This is true for all three organizations.

As mentioned, the Department of Public Safety is an accredited law enforcement agency through the Commission on Accreditation for Law Enforcement Agencies (CALEA; http://www.calea.org). The Department recently participated in a re-accreditation assessment that involved the review of policies and procedures by the Commission to ensure compliance with contemporary CALEA standards. The CALEA accreditation process is extremely rigorous and is recognized as a major accomplishment within the law enforcement profession. Accreditation does not focus on unique relationships between law enforcement (DPS) and security departments (HHC and Housing) working in concert in a campus environment, however it does promote collaboration and coordination of general public safety services. Interviews and discussions with DPS staff and a review of the Department’s policies and procedures reflect disconnects. DPS Policies and Procedures 3.04 Crime Prevention and Community Involvement states:
DPS has adopted the philosophy of Team Community Oriented Policing (TCOP). This philosophy states, “DPS is committed to actively engaging with the community it serves and establishing close ties by anticipating and responding to the needs of the community. We are equally committed to the concept of a community partnership relative to problem solving, reducing risk and reducing crime and the fear of crime; therefore, each member of DPS has the responsibility for crime prevention and fostering cooperative efforts with the community to address and improve quality of life issues on a 24-hour basis.”

The Field Operations Bureau is tasked with the responsibility of maintaining community relations with University Housing and Hospital Security staff. To determine the effectiveness of this endeavor, the commander of the Field Operations Bureau or designee is tasked with evaluating the programs instituted every three years. We could not locate documented evidence of any evaluations. DPS officers we spoke with consistently articulated examples of the lack of relationship with HHC-Security in light of these issues.

Conversely, DPS staff expressed a strong partnership with the Housing Security Office and the student residential community. Some of the student residential staff were unaware that the University of Michigan Department of Public Safety is a full-service police department and believe that it is often the Ann Arbor Police who respond to the residence halls when sworn law enforcement services are needed. We expect that the general residential student population may not fully understand or appreciate the nature, role and authority of DPS but that student hall staff would. While this may not solely be the responsibility of DPS, and may reflect on Housing Security, it is a reason to pause and consider the nature of the relationship between the two organizations. On a positive note, the similarity of the DPS and Housing Security uniforms, and the coordinated efforts for dispatch operations and joint response to incidents within the residential community reflect the perception by students of a unified public safety function.

The staff and leadership of DPS, HHC and Housing Security are meeting more frequently as a result of the Jenson investigation and the management response to the internal audit. Feedback as to their effectiveness in building/rebuilding relationships was anecdotal but deemed to be a step in the right direction.
At the time of our campus visit, The *Response/Incident Report Guidelines* was a document generated by the Director of HHC-Security, but not yet in effect. Neither the Chief of Police nor the Director of HHC-Security had signed off on the guidelines but DPS officers were treating the draft document as policy. At the time, this was an example of the lack of coordination in the process of policy development between the two organizations and the lack of communication with front line staff on new directives pertaining to coordination between HHC-Security and DPS. In this case, the information contained within the correspondence had a direct impact on DPS operations within medical facilities. We found that a similar document was generated in 2009 as a memorandum of agreement to clarify roles and responsibilities but we could find no evidence of implementation. According to the September 2012 Safety & Security Steering Committee Draft Report on the Status of Management Response to Audit, an extensive set of common guidelines and protocols for reporting security incidents throughout the University were completed. Specifically, (1) Guidelines for Security Cooperation During Investigations; (2) Response/Incident reporting guidelines for HHC Security; (3) Common Reporting Guidelines for Housing Security; (4) Chart of Investigative Duties regarding allegations of criminal misconduct. This is an important accomplishment towards the enhanced operations of these three organizations.

Like its peers, Housing Security has well-established, clear and organized policies and procedures on matters germane to its scope of responsibility. More so than HHC-Security, Housing Security is often not consulted or consistently included in conversations and decision-making related to larger public safety policy and procedural changes that have major implications for their staff. The most recent examples include changes to accessing criminal database information through the Michigan Courts & Law Enforcement Management Information System (CLEMIS), and the inconsistent sharing of information between DPS and Housing Security. DPS was required to make changes to database access in accordance with CLEMIS policies, and according to Housing Security, did so without sufficient conversations and discussions to mitigate the impact on Housing Security operations. While it is possible that this is an isolated incident of miscommunication, it is also likely to be indicative of larger communication challenges.
REPORTING & METRICS

9-1-1

While the scope of our services did not include an analysis of the 9-1-1 system on campus, portions of the system are germane to the understanding of organizational challenges between DPS and HHC-Security. Documents we reviewed found that the Hospital Facilities Control Center (FCC) follows joint 9-1-1 protocols differently than the Department of Public Safety (DPS) does in regards to staffing, training, and policy and procedures stipulations.

HHC-Security FCC handles 9-1-1 calls for the Health System via their multi-line telephone system (MLTS). Historically, University Hospitals used a Centrex 1-2-9 telephone number to route in-house cardiac emergency calls to FCC, and a 9-1-1 telephone number to request police, fire, and non-cardiac medical emergencies answering at DPS. To simplify staff training and streamline procedures, and to avoid confusion, it was agreed that Hospital staff would discontinue use of the 1-2-9 telephone number and use only 9-1-1 with the FCC being designated as a secondary PSAP, which did not occur. As the only PSAP compliant and designated entity at the University of Michigan, the Department of Public Safety (DPS) handles non-hospital MLTS 9-1-1 calls via the University’s own private branch exchange (PBX) phone system. Dialing 9-1-1 from a phone in the HHC system will connect the caller to the HHC-Security Facilities Communication Center. Dialing 9-9-1-1 from a hospital phone will connect the caller to the Department of Public Safety. Although there have been several recommendations and suggestions made by DPS to HHC-Security to resolve the issue of how best to operate the 9-1-1 calls, at the time of our campus visit we were not aware of protocols, policies and procedures agreed upon by the directors of each department and endorsed and approved by senior leadership (AVP, VP and EVP). It would be a best practice both as a risk management tool and to reduce potential liability issues for the University of Michigan to use one department to handle all 9-1-1 calls. We recognize that the University is currently exploring options (see below).

For the purposes of this report, the challenges in how emergency calls and service calls are handled speak to the larger issue of collaboration and communication. According to the September 2012 Safety & Security Steering Committee Draft Report on the Status of Management Response to Audit, a review of the use of 911 triage and dispatch was completed. Specifically, the actions completed included:
• The review of the two locations that receive 911 calls originating from University phone lines has been completed. Several enhancements have been made.

• In February, HHC-Facility Control Center (HHC-FCC) scripts for answering 911 calls were improved by: a) stressing that the communications officers answering the calls clearly identify themselves as Hospital Security, and b) informing the caller as to who (i.e.: which department) will respond to the call.

• Also as of February, HHC 911 calls have been separately logged/tracked manually and review of calls began by HHC Security (calls were previously logged/reviewed but emergency and non-emergency call data could not previously be separated). Since calls were first tracked, separated, and reviewed in February through current, there have been no police/crime related HCC-FCC 911 calls – the majority has been in-house medical emergencies or patient management type calls. All phone lines in HHC-FCC are and will continue to be logged and reviewed.

• DPS continues the practice of monitoring all Hospital Security officer dispatch calls in real time, and continues to have the ability to respond to any and all Hospital Security dispatched calls where DPS thinks it appropriate.

• A feature has been added recently to the HHC-FCC system which allows HHC to bring DPS into an HHC 911 call when appropriate (crimes in progress are to be transferred directly to DPS). New features allow either a) conference call or b) dedicated transfer. Staff have completed training on the new features/procedures.

• DPS will hire an outside consultant to review the quality level of its communications center operation.

LEIN

The State of Michigan utilizes the Law Enforcement Information Network (LEIN) for law enforcement officials (police and dispatchers) to access sensitive and confidential information such as criminal histories, warrants and driver’s license information. If non-authorized individuals access this information, LEIN can prohibit the agency in violation from accessing its database. Without this information-sharing tool, law
enforcement agencies in the State of Michigan would be severely crippled in performing their job duties and responsibilities.

According to the DPS Operational Improvement Committee (OIC), the committee received information that a memo was sent in 2005 to DPS from Kathleen Fay, of the Law Enforcement Information Network (LEIN) Field Services, that indicated HHC-Security does not qualify for LEIN access. The Department of Public Safety (DPS) informed the OIC that it would comply with the LEIN directions and not allow HHC-Security access to the LEIN database for law enforcement sensitive and confidential information.

At the time of our campus visit, HHC-Security and the Department of Public Safety (DPS) had a temporary “Report Guidelines” structure in place for reporting incidents to help determine when the police should be called. This has now been finalized. For example, when a theft occurs in the Hospital, the HHC-Security investigator will determine if the incident is criminal in nature, and if it is, the investigator will call police dispatch so that a DPS officer can handle the situation. Housing Security does not have or require such a document because DPS serves as their dispatch operations and all calls for security or police are handled at DPS.

DPS staff we interviewed communicated that they did not like this tentative agreement and preferred to be called for all potential criminal incidents. HHC-Security staff interviewed believes that DPS investigators do not provide information on the criminal incidents they investigate that occur in the Health System. Our observations may not accurately reflect the working relationship of the directors of the two organizations, but a lack of reporting priorities, collaboration and communication has led to a palpable lack of trust and respect between the front line staff of DPS and HHC-Security. DPS may not have a clear understanding of activity in the Hospital, thereby affecting the staff’s perception of crime reporting. Some stated that the rules and regulations governing the job duties and responsibilities of DPS and HHC-Security need clarification. According to the September 2012 Safety and Security Committee Draft Report on the Status of Management Response to Audit, the reporting guidelines have been implemented across all three units (see p. 38 for details).
**Weapons**

The University of Michigan Hospitals and Health Centers policy, number 05-3-050, prohibits dangerous weapons on the property. The policy states that exceptions are granted for on-duty law enforcement officers on official business but there are no exceptions to the policy for law enforcement officers entering in-patient psychiatric units. HHC-Security operates with a “weapons free zone” preference and would rather that DPS officers not move about the hospitals with weapons carried or displayed, and if they do, they want armed officers to register with HHC-Security. It is reasonable for the Health System and HHC-Security to know where weapons may be in the hospitals. Some HHC staff shared their belief that an increased DPS presence in the hospitals would enhance the overall safety and security of the hospitals, especially in the emergency department and for assistance in dealing with the rise of behavioral challenges from an increase in the number of mentally ill people roaming the facilities. In our opinion, the real issue is not on-duty DPS officers carrying weapons in the hospital facilities but rather the expectations for DPS officers when in the hospitals and health care system.

**Leadership**

Some of the HHC-Security staff we interviewed believes that a lack of stability in the leadership at DPS in recent years has contributed to the issues between the two departments. The instability has led to confusion in the areas of policies and procedures and the enforcement of rules and regulations, especially with The Health Insurance Portability and Accountability Act (HIPAA). One stated, “We have to rebuild relationships and reestablish two-way communications. Leadership is important within units and across units and all of us must cross connect and be accountable for our actions. We can never over-communicate.” We do not entirely support this perception from HHC-Security staff and recognize that all sides have a role to play in the health of a relationship, but we resonate with the inherent kernel of truth that leadership plays an important role.

The Department of Public Safety is well organized and operates with procedures and written directives that generate daily, weekly, monthly and annual reports to provide information utilized for strategic planning, crime analysis, crime prevention planning and, most importantly, resource allocation. DPS created a strategic plan, which includes specific goals and performance objectives with specific outcome measurements that we found reasonable and consistent with the mission of the organization.
The DPS Oversight Committee (required by the laws of the State of Michigan) and the Campus Safety Security Advisory Committee (CSSA; established by University leadership) exist to provide various levels of oversight and advice to DPS. In hearing internal affairs and community complaints, the DPS Oversight Committee functions to monitor the overall performance of the Department and staff in meeting the public safety needs of the community. DPS leadership indicates a strong, positive relationship with the Oversight Committee. The CSSA appears to exist to provide advice and insight to the University’s public safety functions, and we heard confusion in whether or not the committee serves one specific organization or all three? While it was not within our purview to assess the overall effectiveness of these two committees, the CSSA is presumably aware of the issues between DPS and HHC-Security and we can find no information to support that the committee, by way of role, membership or both, is or has been effective in helping to address the conflicts and issues we’ve observed. Strengthening the role and impact of this committee may prove to be invaluable in addressing collaboration between the three public safety organizations.

DPS officers perceive that HHC-Security is permitted to investigate low-level crimes (it is unclear how these are defined), and only refers those crimes that require actual criminal charges to DPS. Once contacted, a DPS investigator creates court documents that rely on HHC-Security investigation reports when filing criminal charges. We heard from DPS personnel that this places them in a difficult situation related to filing affidavits of probable cause, search warrant applications and other court-required sworn documents based on HHC-Security officer paperwork but we are not as concerned. Police officers regularly rely on security officer statements to build court-related documents (e.g., shoplifting apprehensions made by store security who then call local police to make the arrest). Contrary to some of their comments, DPS staff did acknowledge that HHC-Security is helpful with misdemeanor crime investigations and serving court documents. What is concerning is the lack of agreed upon protocols for what crimes are to be reported to DPS and when the report should be made. In this area, we see a slippery slope. Much of this is now being addressed in recently issued reporting guidelines.

DPS personnel shared their perception that they are not allowed to serve subpoenas inside the hospital, a perception refuted by Interim Chief Piersante and Director Hollier. DPS officers that we interviewed explained that HHC-Security serves the subpoenas for them, which is problematic in
their eyes because the court service of subpoenas requires law enforcement officers to indicate that they personally delivered the subpoena. On the one hand, we experienced DPS officers being strident in the performance of their official law enforcement duties. Yet on an issue that may have merit in the eyes of the courts, they choose to acquiesce to what they understand or perceive HHC-Security’s instructions to be. Some medical staff shared with us that they and their colleagues fear DPS officers and avoid interacting with them. Stories of hospital and institutional staff threatened with obstruction of justice charges or “bullied” by DPS officers has created a sense of fear that may be having an impact on DPS and its ability to carry out its obligations.

**HUMAN CAPITAL & SKILLS**

The HHC-Security mission is dedicated to maintaining and promoting a safe and secure environment in a diverse community: to care for, assist and serve patients, visitors and staff with compassion, respect, integrity and professionalism. While a full staffing audit was not within the scope of work for this project, HHC-Security’s commitment to providing a safe and secure environment is clearly evident with the allocation of human capital dedicated to the security function of the hospital.

Our exploration into the deployment of human resources in HHC-Security shows a reasonable frequency of routine day-to-day patrol across areas that include security sensitive areas such as parking, in-patient, clinical, public, etc. In addition, we are satisfied that they appropriately evaluate non-scheduled activities and calls for service routinely performed by security personnel that include investigative activities, service calls, problem resolution, lost and found, special assignments, etc.

HHC is an active and dynamic public place with many entrances, visitors, vendors and staff. The responsibility of protecting people and property while maintaining privacy and the continuity of care is a challenge that we believe HCC-Security does well. They have a program in place to address hospital compliance requirements with external agencies. As the government requires new and changing regulations, site security and emergency planning, evaluations and inspections, HHC-Security assists with compliance and requirements for The Joint Commission, HIPAA, CMS, OSHA and other accreditation inspections.

A comprehensive hiring process ensures that officers have security experience and higher education degrees. For some, this includes both
bachelor’s and master’s degrees. HHC-Security orients each security officer to the hospital and department under the direction of a training lieutenant. HHC-Security is developing a system by which employees can choose a development path. For example, it would establish a supervision path, a trainer path, a physical security expert path, etc. It is creating different levels of expertise based on education, experience, etc. (similar to a skilled trades apprentice, journeyman, master, etc). In addition to the hiring and training programs, HHC-Security has partnered with the International Association of Healthcare Security and Safety (IAHSS) in a commitment to certify each officer and staff member within the department according to IAHSS guidelines. The International Association for Healthcare Security and Safety is the world’s leading organization specializing in healthcare security and safety. With a proven 35-year track record, IAHSS certifications have enabled healthcare security and safety personnel to tackle the special needs of healthcare institutions.

Presently, HHC-Security has nine (9) staff members who have achieved the distinction of IAHSS Certified Healthcare Protection Administrator (CHPA), the most of any single institution in the world. The Certified Healthcare Protection Administrators (CHPA) exam is administered by the Commission to those who qualify and consists of progressive credentialing levels culminating at the graduate level. Once achieved, candidates have twelve (12) months in which to become a Certified Healthcare Protection Administrator (CHPA). All HHC-Security officers have achieved the IAHSS Basic Officer Certification, which focuses on the knowledge and skills identified in the IAHSS Basic Training Manual and Study Guide, developed and regularly updated by professionals in healthcare security and safety. This is quite impressive.

We observed DPS staff to be competent, professional and proud of their service when discussing their collective and individual roles in providing law enforcement services to the campus community. DPS police officers strongly identify as law enforcement officers, and as part of a full service, professional police agency with duties consistent with traditional law enforcement responsibilities: enforcement of the law, investigation of crimes, apprehension of criminals, prevention and detection of crime, and maintenance of public order. This is common in our experiences working with university and college police departments, and is at times problematic when college police officers over-identify with traditional responsibilities. University and college policing is the genesis of the modern U.S.-based community policing movement harkening back to Yale University in the
1800s. They are proud of their status as a CALEA accredited police agency, and received their award for reaccreditation at the CALEA Conference in Scottsdale, Arizona, in July 2012.

DPS police officers are proud of their training and the specialized positions they staff (e.g., tactical, K9 patrol, motorcycle units, bicycle patrol units, criminal investigations, and computer forensics investigations). They shared their success in establishing strong partnerships and mutual aid agreements with city, county, state and federal law enforcement agencies. DPS staff is proud of their Public Safety Answering Point (PSAP) and Dispatch Center for 9-1-1 emergencies and calls for service occurring on campus. One officer stated, “The University of Michigan is a world-class University, with world class hospitals and sports teams. We want to be a world class police department.” In our opinion, they have achieved this level of professionalism.

DPS sworn staff is assigned to one of four designated patrol districts with team assignments that encourage community policing and problem solving, yet DPS personnel did not self-identify to us as service oriented, community policing and problem-solving officers. This is not how HHC-Security or Housing Security, by and large, experiences them. This particular identity and role is relegated to a sergeant and officers assigned to Team Community Oriented Policing or TCOP. During the course of interviews and during the site visit, DPS staff did not demonstrate a consistent and strategic vision for community policing and problem solving or community engagement. Since our site visit, the Department has undergone reorganization under Interim Chief Piersante’s leadership that appears to focus more internal resources on community engagement. In some ways, the implementation of specialized units appears to have overly focused the organization on crime mitigation and response, as opposed to prevention and service. Members of the community whom we interviewed validated this perception, and it may be a root cause of some of the DPS issues we observed or learned of. It is not our intention to devalue these specialized units. In fact, the University is better served in many ways by having such highly trained and deployed resources.

DPS police officers appear to be directing their attention towards validation from the greater law enforcement community and away from their focus on serving a university community as a community-oriented campus public safety organization. A community focus and enforcement are not dichotomous. They can coexist in a campus police organization
and do so at universities and colleges throughout the United States. The balance requires commitment, a clear mission, and the right leadership at multiple levels. Some DPS officers expressed their opinion that HHC-Security treats them differently from other sworn law enforcement agencies in the community. They shared experiences in which an Ann Arbor police officer or state trooper would not be questioned entering the hospital and health care facilities armed with a duty weapon, while a DPS officer would. They perceive disparate treatment and expressed frustration that they are, therefore, viewed as a security department at the expense of their professional standing in the greater law enforcement community. While we do not place one organization above the other, we recognize the cultural significance of this concern. As stated, the conflict with HHC-Security appears due, in part, to a perceived lack of respect and acknowledgment of their standing as law enforcement professionals. DPS’s concern at being viewed as a security organization may be telling of what it projects at HHC-Security. In this regard, the rivalry over standing and resources is palpable. How much of this is actual rather than the result of a confluence of factors inside and outside of DPS is difficult to assess but nonetheless the feelings are real and must be considered in formulating a solution.

Some DPS officers expressed positive feelings towards their counterparts in HHC-Security and Housing Security. Their perception that HHC-Security leadership has little interest in collaborating with DPS is pervasive. DPS officers shared examples of hospital staff (medical) not recognizing DPS authority and responsibility to investigate crimes on hospital property, and stories of hospital employees interfering with investigations. DPS staff confirmed that they have indicated that they would arrest medical staff for obstruction of justice and interfering with investigations. Threats of such arrests have become a core issue between DPS and medical, legal and security staff. DPS officers also acknowledge their professional responsibility in promoting positive working relationships with HHC-Security and Housing Security staff, and many shared examples of positive relationships with individual security officers. Unfortunately, these individual relationships may not be impacting the health of the overall relationship between the organizations. Some DPS staff expressed their belief that Housing Security leadership promotes positive working relationships with DPS, while HHC-Security leadership does not.

New efforts to reduce conflict between DPS and HHC-Security have begun, and include regular meetings between the leaders of the three organizations (DPS, HHC-Security, Housing Security), and weekly meetings
between DPS and HHC-Security investigators to exchange information. The development of a crime reporting protocol agreement between DPS and HHC-Security is underway, as are regular DPS roll call briefings with Hospital Security. Police and public safety departments historically use roll call briefings to pass information between shifts. The Draft Report on the Status of Management Response to Audit (September 2012) shows that the University has made significant progress to addressing many of the issues identified in this report, and those recommended by University Audit. Specifically, improvements already implemented and planned include the development of an extensive set of common guidelines and protocols for reporting security incidents throughout the University. Management response to audit recommendation is substantially complete. The following documents were written: (1) Guidelines for Security Cooperation During Investigations; (2) Response/Incident reporting guidelines for HHC Security; (3) Common Reporting Guidelines for Housing Security; (4) Chart of Investigative Duties regarding allegations of criminal misconduct. Regulations concerning patient and student privacy were incorporated into the relevant guidelines. The guidelines have been incorporated into training modules.

The Steering Committee with the help of the Office of General Counsel and University management have one step to complete: the development of (1) Guidelines for Security Cooperation During Investigations and (4) Chart of Investigative Duties regarding allegations of criminal misconduct need to be reviewed by investigative units that were not represented on the work group. An individual has been identified from the Provost Office to assure that museum security guards (which are UM employees) are brought into the training/process as appropriate. Furthermore, the following areas have also been completed. We are encouraged by the current activities and a renewed commitment by each departments’ leadership.

- Two of the work groups (Duty to Report, and Team Building Training Programs) will continue to meet to make additional improvements.
- New permanent cross department teams and permanent collaborative cross department meetings are now in place to ensure continuation of recently implemented improvements, as well as to make additional improvements going forward. Cross department teams and cross departmental meeting groups
include:

- Cross functional training for DPS, HHC Security and Housing Security: to include response and basic crime scene preservation protocols.

- Cross-functional training team: to develop opportunities for all Campus, Housing, and Hospital staff to train together such as FTO training, ACOP, incident report writing, bike patrol training. When possible they will use team instructors from all three departments.

- Weekly Crime Team: UMPD Crime meetings that include Housing and Hospital investigators.

- Crime Alert/Clery Team: weekly crime meetings.

- DPS Liaison Officers make daily connections with Hospital Security shift supervisors.

- The directors of the three public safety and security departments meet regularly.

Housing Security would like better coordination and collaboration in hiring processes and practices with the DPS. As unionized security agencies, they believe that there can be better information sharing for potential candidates and those who may not be a good fit for any of the three organizations as well as potential cross-training and professional development opportunities. While Housing Security staff by all accounts are well trained and prepared to respond to crises, they are concerned that significant reductions in the Housing Security budget over the past several years are negatively impacting their professional development opportunities.

Lastly, we learned that more than twenty years ago, when the University first established the Department of Public Safety, members of the campus community were concerned with having a “police department or law enforcement agency” on campus. We were told that the solution to address the concern resulted in the moniker, “Public Safety.” We find merit to the concerns shared by DPS staff that the term Public Safety creates some confusion as to their role and expectations on campus, and may partially contribute to some of the coordination and communication challenges with HHC-Security and Housing Security. We experienced this confusion ourselves during our campus visit.
SECTION IV - BENCHMARKING RESULTS

METHODOLOGY

In addition to a cultural assessment of campus safety and security functions, The University of Michigan contracted Margolis Healy & Associates (MHA) to conduct a benchmarking study of institutions of higher education that share its:

1. Size
2. Complexity
3. Organizational structure relative to the areas under review (i.e. Department of Public Safety, Hospitals and Health Centers Security, and University Housing Security)

The criteria developed by the University of Michigan for this benchmarking study was that each institution have:

1. Its own police department
2. A residential housing system with similar complexity and scale to the University of Michigan
3. A large, owned/affiliated and co-located health care system

Eight institutions of higher education were surveyed for a benchmarking analysis regarding the organizational structure of their campus safety functions. These included:

- The University of Chicago
- Duke University
- The University of Florida (CALEA & IACLEA Accredited)
- Ohio State University – Columbus
- The University of Pennsylvania, (CALEA Accredited)
- The University of Southern California (IACLEA Accredited)
- The University of Washington – Seattle, (CALEA Accredited)
- The University of Wisconsin – Madison, (CALEA Accredited)
Data collected through phone interviews and/or a questionnaire focused on:

1. The organizational structure and reporting relationship of various campus safety branches (law enforcement, residence hall and hospital security)
2. The size of personnel/staffing; overall budget; policies and procedures between these branches
3. Safety issues and concerns within the medical facilities

**Budget**

The institutions surveyed were asked to disclose the operating budgets for the following campus safety functions: law enforcement, residential security and hospital security:

- The overall budget for law enforcement function ranged from $6 to $15 million.
- The overall budget for hospital security (for the five institutions that disclosed these figures) ranged from $1.9 million to $9 million.
- Only one institution disclosed its residential security budget, which was approximately $120,000.
- The overall budget for law enforcement, residential security and hospital security functions (for the four universities that disclosed this information) ranged from $17.2 million to $25 million.

**Personnel**

The total number of campus safety personnel is difficult to compare among the surveyed institutions due to their different organizational structures.

- The reported number of sworn officers (for all eight surveyed institutions) ranged from 55 to 116.
- There was a range of 100 to 206 total staff members for departments reporting figures for their law enforcement function.
- There was a range of 176 to 300 full-time employees among institutions that disclosed the total staff size for their division of public safety.
Only three institutions reported having a separate residential security function. The size of their staff ranged from one to twelve employees. (These figures do not include the private security staff that is outsourced for the residential facilities.)

There was a range of 22 to 133 employees among the institutions who disclosed the size of their hospital security personnel.

**Law Enforcement on Campus**

Among the eight institutions surveyed, the following represents their campus law enforcement agency’s: 1) organizational structure; 2) legal authority; and 3) reporting structure.

- The law enforcement functions of all the universities surveyed fall under the jurisdiction of a police department, a department of public safety or a department of safety and security.
- The law enforcement authority for seven of the eight schools surveyed is provided from the state.
- One school’s law enforcement authority is provided through an MOU from the local city police department.
- Six out of the eight universities surveyed noted that their police departments report to a vice president position in the institution’s Finance and Administration office.
- One institution reported that its police function reports to the Vice President for Business Affairs (who reports to a senior vice president and chief operating officer).
- One university has their police department report directly to the Vice Provost for Student Life.

**Residential Security**

In regards to maintaining residential security on campus there was considerable variation among institutions surveyed as to whether they maintain a separate residential security function or rely on campus law enforcement to patrol and address safety concerns in residential halls.

- Five of the eight institutions did not have a separate housing security function within its residence halls. Instead, these universities relied internally on their police departments to
address safety issues in these locations. Several stated that residential safety on campus was primarily a “student-staffed security operation,” which called upon the police “as needed,” and was dependent on “a good working relationship” between police officers and Student Affairs.

- One of the universities surveyed (that does not have a separate residential security department) noted that their police department “has a very active” Residence Hall Liaison Police Officer Program where one or two officers are assigned to a residence hall during the evening shifts and occasionally participate in their student events.

- Another university has two police officers (paid overtime by the Residential Life Department through an MOU) patrol residential halls until 2 to 3 a.m. every evening.

- One university (that does not have designated residential security staff) uses an Adopt a Hall program that “creates programming with Residential Education staff to provide security, emergency preparedness and fire safety information.”

- Another university uses an Academic Security Division of 35 non-sworn officers (under a Department of Public Safety) to address safety issues in residence halls. The role of these officers are “to assist” in residence halls when requested but not on a routine basis. This was described as a “well-working overall security approach.”

Three of the surveyed universities have a designated residential housing security function:

- One university employs a private security firm to safeguard their residence halls. A staff member is assigned as a liaison to the security guards and reports to the Vice President for Business Services (who funds their budget). The Director of Security Services (within the Division of Public Safety) oversees the security firm’s contracts and the Vice President for Public Safety is tasked with making “major decisions regarding any safety functions.”

- A second university has its Housing Security staff report to the Director of Housing who then reports to the Vice President for Student Affairs. Their residential security (a predominately
student-staffed operation), keeps their campus police department “informed when law enforcement is needed.”

- A third university has a designated residential security staff that falls under the purview of the Department of Safety and Security, (which is also true of their police function). This approach was described as cost-effective providing “a centralized system for physical security” and placing all of the institution’s public safety functions “under the same reporting structure.” Furthermore, it “removes conflicts and duplications of physical security systems.”

Hospital Security

There is considerable variation across the eight surveyed institutions in regard to what division/branch of the university their hospital security function reports through:

- Several of the universities have their hospital security function covered by their Department of Safety and Security. The institutions have a Director of Hospital Security who reports to the Vice President for Public Safety, who then reports to a Vice President or Chief Financial Administration official. This reporting structure is the same as their police function. All of their public safety functions fall under the same reporting structure and “have one voice for institutional safety.” As one of the Directors of Public Safety noted: “Having all safety functions under one department and reporting to the same Vice President makes it easier to coordinate across campus.”

- Similarly, another university (that has its hospital security function report through its Department of Public Safety) stated, “We eliminate duplicated support structures associated with a security or police department.”

- One institution has a sergeant assigned to Health Services, (which is in a building physically connected to its hospital), who is “a day to day liaison to the Security Director of the Hospital.” Furthermore, the daytime lieutenant and other ranking officers “meet periodically” with the Security Director and Vice President (to whom the Director reports) “to assure a positive working relationship in the event of a major crisis.”
In three of the surveyed institutions, their hospitals hire/outsOURCE a full-time private security firm that is “paid and report through the business side of the hospital.” These non-sworn security officers “defer” to the university police departments for “all law enforcement functions” or “significant issues” related to the hospital.

The two institutions that employ private security firms noted that their internal law enforcement function and their outsourced security officers work “collaboratively together” with “no turf wars.”

At one of the universities, the Division of Public Safety has a memorandum of understanding (MOU) with the hospital, which assigns two officers to an eight-hour patrol shift. The hospital requested “a police presence” to assist with traffic, pedestrians and importantly to assist the trauma center specifically with gunshot victims. “Public Safety is always notified if a gunshot victim arrives at the Trauma Center.” The Division of Public Safety has also worked with the hospital to install metal detectors at the Center.

At another university, the hospital security function reports to the President/CEO of the hospital who reports to the President for Health Affairs.

Yet another university has a hospital private security staff (non sworn) report to the Director of Security who then reports to a Hospital Chief.

One hospital recently moved its Hospital Safety Department to be under the Department of Public Safety. “Over the past ten years there was an informal arrangement where the Hospital Security reported to the Department of Public safety.” This recent change in reporting to the Department of Public Safety “allowed for many efficiencies regarding technology used for safety and better coordination including access control across all of campus.”

Conflicts Related to the Medical Centers

The eight institutions were asked to discuss concerns related to public safety issues unique to their medical center:

One university reported that they have “conflicts every year” among the different security functions on campus concerning the “police use of tasers in psychiatric units.” They noted that this
conflict is “immediately worked out between the hospital security director and police managers.”

- One institution reported that they have had “challenges” at their health center regarding “clinical trials involving drug users and mentally challenged individuals.”

- Another institution reported that they have had “challenges at their health center regarding “clinical trials involving drug users and mentally challenged individuals.”

- Another university with similar concerns noted the successful implementation of a “hospital behavioral response team” to deal with “disruptive patients etc.” This university stated that their police officers have “a great working relationship” with their hospital as a result of “a lot of work done to address safety issues within the hospital.”

- One institution had an issue with their police officers releasing patients under correctional supervision so that the officers would not have to provide police services. As they explained, “The State Department of Corrections Officers is the best prepared and consistently follow policy about the placement and security of forensic patients. However, local and surrounding law enforcement agencies may at times un-arrest individuals requiring a hospital stay so they will not be required to provide security.” This action is often perceived by hospital staff and patients “as a risk” to their personal safety and requires the hospital to provide security “in the area” in order to “manage the person that was arrested.” This university further noted that their police department has worked with the hospital to resolve issues regarding its officers and surrounding agencies who have “at times taken advantage of their position of authority” entering “sensitive areas such as Trauma/ER and Intensive Care Units especially when an officer has ben injured in the line of duty.” The university’s law enforcement function now serves as a “liaison” between the hospital and local law police agencies when “requesting special access to the facility.”

- The “securing of weapons” from law enforcement officers was raised as a concern for a few of the universities surveyed.
• One institution contended that they had “challenges” with officers from “outside law enforcement agencies” who are “sometimes not interested in securing their weapons.”

• Another university contended that officer training and the “development of protocols necessary to handle safety issues and operate” in a hospital setting have helped “eliminate most concerns” and have “improved relationships with the Hospital Administration.”

• Another institution had policies regarding police officers (both on and off-campus) securing their weapons in their healthcare center. These include: 1) Armed officers escorting prisoners to the hospital are allowed to keep their guns and Public Safety is always informed of an armed escort; 2) If an officer is injured on duty his or her weapon will be secured at the hospital; 3) If an off-duty officer arrives at the hospital his or her weapon will also be secured at the hospital; and 4) An on-duty officer on official business can go anywhere in the hospital with a gun, with the exclusion of the psych wards. If they need to go deep into the psych ward they will secure their weapons first.

Policies and Procedures

Participants were asked whether their institutions had policies and procedures that specified how campus police, residential housing security and hospital security collaborated in regards to safety and security issues:

• One university noted that they had many polices and procedures in place “that determined staffing, communications and operations” on campus. Moreover, they contended that these policies are “effectively communicated” and that their success is “evidenced by the close working relationships and operational effectiveness” among the various security functions on campus.

• Several of the universities noted that although they had “no written” policies and procedures between their law enforcement, residential housing and hospital security departments, they were simply “understood.”

• Similarly, another university noted that they have “no written policies or procedures outlining how safety functions operate on
campus. Everything is understood. Each safety function operates under their own directives: security is security and police is police.

- Another university noted that as an accredited police department by the Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA), it has “very detailed policies and procedures for everything,” which per CALEA standards are “updated yearly and trained.” It is required to have “detailed written agreements” and “regular meetings” between its lieutenants and the Hospital Security Director and Vice President, Housing Administration and the athletics administration.
SECTION V – VISIONING EXERCISE

Participants in the visioning exercise represented a wide swath of institutional demographics including faculty and staff from Human Resources, the Chemistry Department, University Audits, the School of Information, the University Library, Housing; Student Affairs, the Department of Public Safety, the Hospitals and Health Care System; HHC-Security, General Counsel, and more.

I. Magic Wand Exercise

If given a magic wand, and asked to make the changes they think are essential to correcting the issues they believe are critical, the participants generated the following “wishes:

- Greater organizational interoperability between the three organizations;
- A single organizational point of contact for all three organizations (e.g., at the vice presidential level);
- Creation of an Associate Vice President Advisory Group for safety and security needs;
- Coordinated university communication;
- Clearer definitions of each role/purpose for each public safety organization, and greater coordination and collaboration between the three;
- Improved frontline teamwork;
- An oversight committee (not an advisory group);
- A leadership component that does not conflict with each unit’s mission or client needs;
- Each unit needs to work independently but be respectful of each other’s work;
- Unified collaboration (Conformity);
- Good compensation;
- Cross-functional/seamless integration;
- Sustainable change/expectations;
- A joint operating agreement between units (Memorializing);
• A review of university culture to understand and incorporate culture of safety units – highest level support;

• A clear definition of safety;

• De-conflicted;

• A shared/supportive understanding of institutional response (No divisiveness)

II. Forces Currently Affecting Safety & Security at the University of Michigan

A. Laws
   1. External Regulations
   2. Regulations

B. Communication
   1. Changing media – social media
   2. Rumors/Conflicting Communications

C. Organization
   1. Similar but different missions among the three security offices; different primary clients; different organizational values and missions;
   2. Conflicting leadership styles
   3. Lack of clarity/role definition
   4. Morale affects performance

D. External Influences
   1. “Customer groups” & their expectations
   2. Current serious safety issues & threats e.g. Active shooter
   3. Impact of current events on other campuses inform our priorities & approaches to law enforcement
   4. Society norms
5. The need for corporate security to protect the art museum and other valuable collections at the University.

6. An increase in activism from community groups (i.e. animal activists)

7. Confusion among the community about the roles & responsibilities between the different security units

8. The perception of safety & security – It’s very safe here and people let down their guard

9. Crime is up / the economy is challenging

E. Politics
   1. The size of the university and decentralization
   2. Increased Regents involvement in personnel issues

F. Engagements
   1. Diversity
   2. Demographics

III. Major Challenges

A. Leadership
   1. Ineffective leadership
   2. Breadth of mission
   3. Failure to recognize common goals
   4. Lack of one clear, coordinated head of the safety process – one goal: orchestra conductor coordination, central development pulled together
   5. Lack of broad vision relative to campus-wide security & safety
   6. Inability to leverage perceived problems/threats for effective change management – social media
   7. Lack of focused/directed coordinated leadership, aligned goals, vision, message, resourcing need orchestra conductor
8. Unclear policies/guidelines – too many differences – lack of coordination – “What is crime?”

9. One brand needed for all safety & security

10. Different areas of focus – mission – patient care vs. catch the bad guy

B. Communications

1. Faulty/Lack of communication

2. Technology – 911 from cell phone connects to AA or Washtenaw County – Caller doesn’t know address

3. Understanding the difference between police and security

4. Proactive vs. Reactive

5. 911 call on campus goes to the Sheriff’s Dept & they want to know the caller’s address – students/faculty/staff do not know address of campus buildings

6. Turf & Territory Issues

7. Systems that don’t talk to each other – IT/Technology – Phone

8. Poor communication due to conflict avoidance personalities

9. Overlap and duplication of effort

C. Trust

1. Lack of trust

2. Culture of fear and blaming

3. Lack of trust and understanding within the three units

4. Lack of awareness – lack of respect

5. Different expectations about the appropriate institutional response to safety & security issues
D. Engagement

1. Community education (e.g. People don’t know when to call who)

2. Engaging the community – students, staff, patients, traffic, AA – Everyone accepts their role

3. Lack of reporting because of belief that it is an acceptable norm

4. Lack of community education and marketing

5. Awareness of cultural differences and concerns especially during crisis and staff/community reaction to that behavior

E. Legal

1. Legal complexities regarding patient rights, student rights – everyone’s rights

2. Perceptions about the limits around privacy laws. When can we share info?

F. Budget/Organization

1. Perception of collaboration contingent on budget authority

2. Security units are aligned with academic areas of the university

3. Separate shadow systems: IT/technology, legal office, HR, phone systems, policies & procedures

4. Many layers of administration – prolongs decision making

5. Budgetary constraints

G. Other

1. Multiple access points intertwined within the city spread across miles
SECTION VI – RECOMMENDATIONS

I. ORGANIZATIONAL REPORTING STRUCTURE

We recommend that you create a shared vision through your reporting structure and suggest the following three options for your consideration:

A. OPTION A: EXECUTIVE DIRECTOR FOR PUBLIC SAFETY & SECURITY

- Responsibility for a single, merged Division of Public Safety & Security that includes Public Safety & Security; HHC-Security; Housing Security; Emergency Preparedness; and related security functions at the University;

- Reports to either the President or the Executive Vice President for Finance & Administration. We recommend this reporting line given either the President’s or Division of Finance & Administration’s broad set of responsibilities across the institution (Division of Finance & Administration is consistent with benchmark data);

- Institutional responsibility for Clery Act compliance;

- Find economies of scale between departments, and consolidate and combine resources, where feasible;

- Responsible for the Unified Public Safety Standard Practice Guide(s);

- Implement an advisory board that includes representatives from each of core constituents that are served;

- A qualified candidate has extensive organizational leadership and transformation skills, and/or broad experience in campus safety and security, and a background in law enforcement, corporate security or medical center security, and is able to obtain clearance classification (Secret/Top Secret) through the US Department of Justice/Homeland Security.
Option A – Create a new office that reports directly to the Office of the President.

**PRESIDENT’S OFFICE**

**EXECUTIVE DIRECTOR FOR PUBLIC SAFETY AND SECURITY**

**DIVISION OF PUBLIC SAFETY & SECURITY**

**ADVISORY BOARD OF 5-6 MEMBERS FROM RELEVANT UNITS & CAMPUS CONSTITUENTS**

**PUBLIC SAFETY**

**HOSPITALS AND HEALTH CENTERS SECURITY**

**HOUSING SECURITY**

**OTHER SECURITY FUNCTIONS**
B. OPTION B: EXECUTIVE DIRECTOR FOR PUBLIC SAFETY & SECURITY AND CHIEF OF POLICE

- This position is the Chief of Police, and as Executive Director is also responsible for a single, merged Division of Public Safety & Security that includes Public Safety & Security; Housing Security; HHC-Security; Emergency Preparedness; and related security functions at the University;

- Reports to either the President or the Executive Vice President for Finance & Administration. We recommend this reporting line given either the President’s or Division of Finance & Administration’s broad set of responsibilities across the institution (Division of Finance & Administration is consistent with benchmark data);

- A challenge with this model may be the amount of attention the Chief of Police is able to give to their role as the Executive Director of Public Safety & Security;

- Institutional responsibility for Clery Act compliance;

- Responsible for the Unified Public Safety Standard Practice Guide(s);

- Timing is such that the University will begin the search for a new Chief of Police, so the timing may be ideal to explore a consolidation of this position. The right person is critical to the success of this option;

- Find economies of scale between departments, and consolidate and combine resources, where feasible;

- Implement an advisory board that includes representatives from each of core constituents that are served.
Option B – Elevate Chief of Police position to “Executive Director for Public Safety and Security/Chief of Police.” Change reporting line directly to the Office of the President.
C. OPTION C: MAINTAIN CURRENT ORGANIZATIONAL STRUCTURE

- Maintain the current organizational structure. Develop a shared vision and philosophy for public safety at the University of Michigan;
- Engender buy-in at all levels. There is significant pride and ownership within each of the three (3) public safety organizations;
- Allows the chain of command the opportunity to participate in, and own, the success of these efforts;
- Supports the professional status of each organization and its leadership;
- AVPs, directors and the organizations are incentivized to conduct the process and for meeting measurable outcomes and goals.

II. DEVELOP A UNIFIED STANDARD PRACTICE GUIDE (INTERAGENCY AGREEMENT)

Regardless of the organizational reporting structure, the “Division of Public Safety & Security” will need to develop a Unified Public Safety Standard Practice Guide as it addresses the issues contained in this report, and previous reports. Develop a shared vision and philosophy for public safety and security at the University of Michigan.

Unified Public Safety Standard Practice Guide

- Clarify inter-organizational roles and responsibilities;
- Develop a shared mission, vision and set of common values;
- Improve communication and coordinate resources;
- Build and enhance trust and respect;
- Create an environment of problem solving and conflict resolution;
- Provides clear set of goals and metrics for which to include in performance expectations, evaluations and incentives;
- The process becomes a tool in and of itself to facilitate understanding, communication, collaboration and goodwill;
- Endorsed by senior leadership.
The process will require collaboration and communication at every level within DPS, HHC-Security, Housing Security, and Emergency Preparedness. Significant effort is already underway in these areas.

**Steering Committee:** Three (3) Directors; representative from the Office of the General Counsel; Office of Emergency Preparedness. (Operationalization and core work of the development of the USPG to include representatives at all levels of the various organizations).

**Oversight and project management:** assigned/appointed staff (internal/external) representing the Office of the Executive Director of Public Safety & Security.

**TOPICAL AREAS**

A. **Policies & Procedures (in process)**
   1. Crime/incident reporting and investigations
   2. Service of court documents
   3. Weapons
   4. Recruitment, selection and hiring
   5. Application of local, state and federal laws
   6. Shared resources
   7. Emergency management

B. **Technology**
   1. Assessment, integration and funding of shared security technology (e.g., video cameras, alarms)
   2. Integrated 9-1-1 Call Center (PSAP/2nd PSAP) and related protocols and processes (potential for backup locations at each site) *(in process)*

C. **Training**
   1. Regular and on-going joint training opportunities on topics of mutual importance;
   2. Field training;
   3. Laws;
4. Accreditation standards;

5. Telecommunications/dispatching;

III. BRAND MANAGEMENT STRATEGY

Develop a brand management strategy that unifies the three (3) public safety functions (all security functions) under a single Division of Public Safety & Security while celebrating their individuality in service to their specific and shared communities. A brand management strategy will reflect and communicate the overarching mission to safeguard people and property.

A brand management strategy will help correct misinformation, miscommunication and misalignment of community expectations in seeking public safety services throughout the institution, at the Hospital & Health System, and in the residential facilities. Develop uniform design standards for uniforms, marks, logos, patches, badges, publications, signage, etc.

Engage The Ross School of Business to collaborate with faculty and students working in strategic brand management & equity, and marketing management to address this need. Involving faculty and students enhances their academic experience and development while leveraging one of our most valuable institutional resources for the betterment of the campus.

IV. RECRUITMENT & SELECTION (EXECUTIVE DIRECTOR FOR PUBLIC SAFETY & SECURITY; CHIEF OF POLICE)

The University of Michigan’s Executive Director for Public Safety & Security and/or Chief of Police is a critical component to the success of the cultural and organizational change. The executive search process should ensure that the successful applicant(s) (depending on the model) fully understands the unique challenges in policing a complex campus environment while balancing the specific needs of students, faculty, staff, patients, and visitors. S/he must have a proven track record engaging the community and, specifically the other public safety functions on campus, in collaborative partnerships that promote proactive, solution-oriented, community-based policing philosophies.

We cannot underscore how important this recruitment and selection process is, and the need for it to be transparent, open and engaging of the multitude of stakeholders at the University of Michigan.
V. FORMAL & INFORMAL ENGAGEMENT

The leadership of the three (3) public safety organizations on the Ann Arbor campus (DPS, HHS, and Housing) along with Museum Security and the North Campus Research Complex must meet formally and informally to discuss policy issues, concerns, successes and procedural challenges relevant to their individual and shared operations and services for the University of Michigan community. Likewise is true for their command staffs and line operations.

Informally, this may take the form of weekly/bi-weekly coffee/lunch meetings between the leadership. Formally, this may be bi-weekly operation’s staff meetings (e.g., supervisors, investigators and communications) to share information, concerns, common problems. Consideration may be given to an annual, shared awards event where members of each of the organization are recognized for their contributions (collectively and individually), along with members of the community who contributed significantly to the safety and security of the institution.
Margolis Healy & Associates, LLC, is a professional services firm specializing in higher education safety and security. Our focus includes, but is not limited to, campus facility security assessments; emergency operations response training and policy development; behavioral threat assessment team development and case-by-case threat assessment consultation; campus public safety management studies and assessment centers; litigation consultation; security technology audits; Clery Act documentation audits; and campus public safety arming studies & deployment strategy development. In January 2008, after more than 15 years each of providing consulting services to clients in the education, public and private sectors, Dr. Gary J. Margolis and Mr. Steven J. Healy merged their practices, Margolis & Associates, LLC and Strategic Security Consulting, LLC, into Margolis Healy & Associates, LLC. Their combined experience has quickly catapulted MHA into one of the leading professional services firms for safety and security needs at universities, colleges and K-12 school systems.

Our team of professionals brings a diverse set of skills and expertise to client institutions ranging from large public universities to private institutions, community colleges and K-12 school districts.

Mr. Healy and Dr. Margolis have been intimately involved in the national discussion on mass notification for college campuses, including Mr. Healy’s testimony before the United States Congress. They have relationships with the industry’s leading providers and have published articles and participated in related webinars on the topic. The MHA emergency notification principles of “Timely, Accurate, and Useful (TAU)” and “Alert, Inform, Reassure (AIR)” have become industry taglines and found their way into testimony and legislation. Our mass and emergency notification template messages, available free through our website, are being used by universities and colleges across the country.

Dr. Margolis, Mr. Healy and their team have personally managed or been intimately involved with scores of critical incidents on college campuses ranging from violent crime to natural disasters (including the 9/11 tragedy and its impact on the schools in NYC). We have first-hand experience in crisis response and recovery planning and operations at institutions of higher education. In 2008, Dr. Margolis was contracted to review the next iteration of FEMA’s emergency action guides for educational settings.
Mr. Healy and Dr. Margolis are the lead authors of the International Association of Campus Law Enforcement Administrator’s Blueprint for Safer Campuses: An Overview of the Virginia Tech Tragedy and Implications for Campus Safety. This document, unveiled at a press conference sponsored by the Woodrow Wilson School at Princeton University on April 18, 2008, is a roadmap for campus safety and security. In 2006, Mr. Healy was selected to serve as a faculty member for the first-ever comprehensive, collaborative Clery Act Training sessions funded by a U.S. Department of Justice grant. As a certified instructor for this program, he has provided training at several programs delivered across the country.

Shortly after the Virginia Tech incident, the President of The National Association of Attorneys General (NAAG), Georgia Attorney General Thurbert Baker, determined to establish an ad hoc Task Force on School and Campus Safety (Task Force) to consider what had transpired since the issuance of the previous NAAG report in 1999, including the incident at Virginia Tech, and issue a report making updated recommendations regarding the prevention of, and response to, violence in schools and on college campuses. Mr. Healy participated in the development of this report, The National Association of Attorneys General Task Force on School and Campus Safety.

In 2008, Dr. Margolis was contracted to review the next iteration of the Federal Emergency Management Agency’s Incident Action Guides to assure their relevancy to the higher education environment.

Margolis Healy & Associates was recently awarded a US Department of Justice, Community Oriented Policing Services (COPS) Office competitive grant to develop and deliver a behavioral threat assessment curriculum for universities and colleges across the nation (www.CampusThreatAssessment.org). We help institutions of higher education develop and implement a threat assessment capacity that fits within their unique cultures and that is effective in both preventing violence and helping persons in need. We train higher education institutions on how to create and implement a threat assessment team (or add threat assessment capabilities to an existing team) and how to identify, investigate, evaluate, and intervene with persons and situations that raise concern on campus. We also consult on individual threat cases and provide guidance on crafting or revising institutional policies and procedures to facilitate effective threat assessment and collaborative case management.
THE MHA METHODOLOGY

Margolis Healy & Associates serves our clients through the development of a Risk Tolerance Profile that assists the institution with identifying the range of realistic threats and vulnerabilities it faces, and then implementing a decision making process to determine which require prevention, mitigation and/or response plans. Without such a process, universities and colleges face the daunting task of giving equal attention to all perceived and real threats. Our process recognizes the range between high impact/low probability and low impact/high probability events. The Active Shooter tragedy (high impact/low probability) and the iPod theft from the library (low impact/high probability) each require different strategies. Impact is defined through the institution and the individual.

MHA has developed a unique, proprietary methodology for evaluating safety and security needs at institutions of higher education based on years of educational campus safety and security experience, research, reflection and evaluation. We assess safety and security at educational institutions through our proprietary 3 Circles of Prevention System™. We have extensive proprietary checklists that support our methodology.

The First Circle asks to what extent relationships and services exist for early interception and intervention for problems and issues germane to faculty, staff and students. Such services may include, but not be limited to, drug and alcohol education and counseling; behavioral threat assessment teams; grievance policies; workplace violence policies and prevention systems; sexual assault, stalking and domestic violence victim advocacy; mediation services and grievance policies and procedures for faculty and staff; and other similar policies and services that address problems before they become a crisis.

The Second Circle explores the extent to which institutions of higher education have employed physical obstacles, delaying tactics and security technology to control, secure or regulate access to the physical plant. This may include, but not be limited to, systems that direct vehicular traffic; security cameras; networked or standalone door locking systems and hardware; campus lighting (interior and exterior); E911 capacity and PBX phone systems; mass notification systems (high and low technology); fire and life safety systems; visitor management policies and practices; inclusion of crime prevention through environmental design considerations; and access control and other security technology tools.
The Third Circle explores measures that enable the institution to respond to events and security and safety related needs in an organized, timely, and efficient manner. This may include, but not be limited to, a public safety function with organized involvement of students, faculty and staff in the security of the campus; memoranda of understanding with area police, fire and emergency medical services; emergency response and recovery systems, policies and procedures that have been trained to; and adoption and implementation of the National Incident Management System (NIMS) and the Incident Command System (ICS). Combined, this third circle of prevention builds capacity for the human response to safety and security requirements.

Taken together, the various strategies depict the interconnected nature of campus safety and security. Changes or decisions made to one area impact the others. The deployment of security technology (cameras, door prop alarms, controlled access points) may or may not have an effect on the number of public safety officers, which may or may not impact other security needs. MHA works with our clients to develop a reasonable campus safety and security program based on their current state and the desired future state.

The measures taken to address safety and security are as much data and metrics driven as they are based on perception. We believe that our expertise, knowledge and experiences uniquely qualify us to assist our client institutions with recommendations tuned to their culture and needs.

Margolis Healy & Associates, LLC is a minority and veteran-owned small business. For a complete listing of available services, please visit www.MargolisHealy.com.
THE MHA PROJECT TEAM

DR. GARY J. MARGOLIS, MANAGING PARTNER & TEAM LEADER

Dr. Gary J. Margolis has more than a decade of higher education public safety experience as the Chief of Police at the University of Vermont, and more than nineteen years in policing. Under his leadership, UVM Police Services became a twice internationally accredited police agency through the Commission on Accreditation for Law Enforcement Agencies (CALEA) for whom Dr. Margolis is a Commissioner. Dr. Margolis holds a Research Associate Professor appointment in the UVM College of Education & Social Services, and a faculty appointment at Norwich University in Northfield, VT. He offers courses in leadership development to masters and doctoral students in the graduate programs at both institutions.

He is a Past General Chair of the University & College Section of the International Association of Chiefs of Police, the oldest and largest police association in the world, and a former member of the association’s executive committee. Dr. Margolis is an active member of the International Association of Campus Law Enforcement Administrators as a member of the Government Relations Committee and Chair of the Education Committee. The U.S. Department of Justice and the U.S. Department of Homeland Security as a campus security expert often call upon him as a campus security expert. He is a much sought after speaker, consultant, educator, expert witness, and trainer on campus safety and security, security technology applications, emergency response and recovery planning, and preventing violence against women crimes on campuses. In the fall of 2008, he evaluated the forthcoming iteration of the FEMA Action Guides for Emergency Response & Recovery.

Dr. Margolis has testified before the United States Senate Committee on the Judiciary on matters relating to criminal justice. Prior to his role as the Chief of Police at UVM, Dr. Margolis was a training administrator at the Vermont Police Academy, responsible for the basic and in-service training of Vermont’s police officers. He has a master’s degree in education and a doctorate of education in Educational Leadership and Policy Studies from the University of Vermont.

In January 2007, Dr. Margolis led a full-scale active shooter exercise on campus and has been featured as a keynote speaker on the subject. Dr. Margolis is a graduate of the Harvard University Kennedy School of Government Executive Education Program on Crisis Management and, in
early 2008, traveled to Israel as an invited guest of the Israeli Government to study terrorism and share his expertise with the Israel National Police and Israel Defense Forces.

Dr. Margolis has been a featured speaker and panelist on emergency response and recovery with Mr. Healy at the annual meetings of the National Association of College and University Attorneys (NACUA), the National Association of College and University Business Officers (NACUBO), and the National Association of College Auxiliary Services (NACAS). His work has been featured in Police Chief magazine and the Campus Law Enforcement Journal magazine.

STEVEN J. HEALY, MANAGING PARTNER

Steven Healy was the Director of Public Safety at Princeton University from 2003 to 2009, where he led the University’s safety, security, and law enforcement programs. He is a Past President of the International Association of Campus Law Enforcement Administrators (IACLEA), and has served as a member of the association’s Government Relations Committee for the past thirteen years. He is a nationally recognized expert on the Clery Act.

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. He has appeared on numerous news programs and talk shows including CNN with Lou Dobbs, ABC Nightly News, CBS, the Fox Network, MSNBC, and National Public Radio. In April 2007, he testified before the U.S. Senate Committee on Homeland Security and Governmental Affairs on the topic of “Security on America’s Campuses.” In May 2007, he was invited to testify before the U.S. House of Representatives Committee on Education and Labor on the topic of “Best Practices for Keeping America’s Campuses Safe.” Security Magazine named Mr. Healy one of the “Top 25 Most Influential People in the Security Industry.”

He completed his term as the chairperson of the National Center for Campus Public Safety Advisory Board in December 2007. In that role, Mr. Healy was responsible for leading the development of a strategic plan and framework for the National Center for Campus Public Safety. In February 2008, Mr. Healy was a featured presenter in a Plenary Session at the ACE Annual Meeting, addressing issues of “Campus Security, Response and Recovery in a New Era.”
Prior to Princeton, Mr. Healy 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. During his tenure at Wellesley College, Mr. Healy was the IACLEA Regional Director for the North Atlantic Region and President of the Massachusetts Association of Campus Law Enforcement Administrators. Mr. Healy is a 1984 graduate of the United States Air Force Academy. He spent ten years on active duty with the United States Air Force as Security Police Officer. From 1992 to 1995, Mr. Healy was the Operations Officer for the 95th Security Police Squadron at Edwards Air Force Base. Mr. Healy is a frequent speaker at national conferences and seminars on issues related to campus safety and security.

He serves as a subject-matter expert for the U. S Departments of Education and Justice. He is currently leading an IACLEA special panel reviewing post-Virginia Tech challenges and concerns for the higher education community. 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. He is IACLEA’s representative to the NACUBO “National Campus Safety and Security Project” and to EDUCAUSE’s “The IT Role in Campus Safety” project. Mr. Healy was a featured speaker and panelist with Dr. Margolis on emergency response and recovery at the annual meeting of the National Association of College and University Business Officers (NACUBO).

Margolis, Healy & Associates, LLC has created a “dream team” to provide the highest level of service to our clients. They assist in the execution of projects and delivery of services in accordance with their professional standing and our prerequisite skills. MHA works with only the best and brightest colleagues to ensure that we exceed our clients’ expectations, and we select our associates carefully based on their experiences, qualifications, and reputations.

KATHERINE G. FORMAN, PROJECT ASSISTANT

In addition to her employment with MHA, Ms. Forman is a Conference Developer for Legal Issues in Higher Education, a national conference run through the Continuing Education Department at the University of Vermont (UVM). Prior to her current positions, Ms. Forman worked as a Facilities Analyst for UVM’s Campus Planning Services where she managed and maintained spatial information and reporting for
the university including building floor plans, campus mapping and a comprehensive spatial database. Through her employment at UVM, Ms. Forman gained university and college emergency planning experience including pandemic planning and preparation. Before her employment at UVM, Ms. Forman worked for ESRI, the world’s leading GIS software company, on a handheld mapping project for first responders. The effort allows responding firefighters the ability to view site locations and building floor plans on their handheld computers.

Ms. Forman is a graduate of the University of Vermont with a Bachelor of Arts Degree in Geography & Political Science with a certificate in Computer Software and also earned a Masters in Public Administration (Pi Alpha Alpha Honor Society). Katherine lives in Shelburne, Vermont with her husband and young son.

**JOSEPH FORTE, ASSOCIATE**

Joe Forte began his broad based knowledge and career in healthcare security and safety in 1979, as a Security Officer in a moderate-sized Catholic hospital in Philadelphia. Through his professionalism and passion for the field he advanced his career to his current position as Director of Security for the Hospital of the University of Pennsylvania, a large urban facility, flagship of the University of Pennsylvania Health System, widely recognized as a dynamic and progressive leader in healthcare.

Joe received his B.A. in Criminal Justice from LaSalle University in 1987. In 1996 he was certified in Health Care Administration by Ohio State University. Joe was awarded a Masters Degree in Homeland Security and Public Safety from St. Joseph’s University in 2008. This dual degree program is the first in the nation to include Homeland Security as an advanced specialty. In this same year, Joe achieved the designation of Certified Healthcare Protection Administrator from the International Association of Healthcare Security and Safety.

Among his many professional accomplishments, Joe is proud to list the following highlights: IAHSS member since 1987; IAHSS State Chair, 1989 – 1994; IAHSS Regional Chair, 1994 – 1998; Citizen of the Year Award, 1997, Philadelphia Police Department; IAHSS Commission on Certification, 2007 to present; IAHSS Chairperson for the Commission on Certification; 2010 – present; Vice President of the FBI Community Alumni Association Board, 2010 – present.
AARON L. GRAVES, ASSOCIATE

Aaron Graves has served in the field of law enforcement and security for 38 years. He is the former Associate Vice President of Campus Safety and Security for Duke University in Durham, North Carolina. At Duke, he led nearly two hundred sworn, proprietary security and contract security officers who were responsible for law enforcement and physical security for Duke University, Duke Medical Center and the Duke University Health System. During his tenure he was instrumental in enhancing police community relations within the campus community as well as fostering collaborative efforts with local law enforcement. His expertise in emergency planning and management was vital in the continued development of plans and training exercises for the university community. Aaron resigned from his position in June of 2010 to pursue other interests in campus public safety. This assignment was one of several key leadership positions he has held in campus public safety during the past 18 years after retiring as a Captain from the United States Air Force Security Police.

Prior to serving at Duke, Aaron was the Executive Director/Chief of Public Safety for the University of Southern California, in Los Angeles which is one of the largest university public safety organizations in the nation. During his three year tenure at USC, crime impacting the university community was reduced by 26% through strategic initiatives and community support. He led major upgrades in technology, staffing and facilities to enhance the overall professionalism of the organization. This greater sense of professionalism was a key factor in improving the relationship with the Los Angeles Police Department and their overall support to the university community.

He also led the Southern Methodist University Police Department as Chief of Police/Director of Parking for ten years in Dallas, Texas. There he gained a wealth of knowledge and experience in managing operations for dignitary protection. He oversaw campus visits of current and former United States Presidents, Royalty and other foreign heads of state.

Aaron served in various capacities in professional organizations representing the law enforcement community. Most recently, he served as a Commissioner for the International Association for Campus Law Enforcement Administrators Accreditation Program and as a member of the Advisory Board for the Institute for Law Enforcement Administration.
He has held membership in the International Association of Campus Law Enforcement Administrators (IACLEA), The International Association of Chiefs of Police (IACP) and the National Organization of Black Law Enforcement Executives (NOBLE). He has made numerous professional presentations including sessions at IACLEA and NOBLE on timely topics related to crisis management, leadership/supervision and crime control.

Aaron holds a Master of Liberal Arts from Texas Christian University and a Bachelor of Science in Criminal Justice from North Carolina Wesleyan College.

**DR. STACEY A. MILLER, ASSOCIATE**

Dr. Stacey A. Miller has over 15 years of professional experience in student affairs and higher education as both an administrator and instructor. Dr. Miller currently serves as the Director of Residential Life at the University of Vermont a position she has held since 2003. She began her professional career at Stony Brook University, New York, where she also earned her Bachelor of Arts in Social Sciences and Master of Arts in Liberal Studies degrees. She received her Doctorate of Education in the Educational Leadership and Policy Studies program from the University of Vermont. In addition to her administrative post Dr. Miller is as an adjunct lecturer for graduate-level courses in cultural pluralism and religious, spirituality and education.

Over the course of her career she has facilitated countless training sessions focused multicultural/intercultural competence and student development; Dr. Miller has presented at a various conferences and institutions nationally on a variety of topics related to diversity, social justice education, and intercultural communication. She is also a successful participant of the nationally renowned Social Justice Training Institute (SJTI) and is a Qualified Administrator of the Intercultural Development Inventory (IDI), which have helped to further her knowledge and understanding of diversity, social justice education, multicultural competence, and intercultural communication. Dr. Miller has provided service to the UVM community via her leadership as an original member of the President’s Commission on Lesbian, Gay, Bisexual, and Transgendered Equity, and currently serves as the Chair for the President’s Commission on Racial Diversity.

Dr. Miller has been recognized at the University of Vermont on several occasions with the Police Services Civilian Service Award, the Women’s
Center Outstanding Staff Woman Award, and the HESA Program, Jackie Gribbons Practicum Advisor of the Year Award. She is also a member of the Golden Key, National Scholars, and Pi Gamma Mu National Honor Societies. Dr. Miller is also the President and Managing Partner for the Consortium for Inclusion and Equity (CIE) a consulting firm committed to helping businesses and educational institutions gain the necessary knowledge and skills needed to become more inter-culturally and multiculturally competent.

JEFFREY J. NOLAN, ESQ. (DINSE, KNAPP & MCANDREW, PC)

Margolis, Healy & Associates collaborates on our projects with Jeffrey J. Nolan, a partner with the law firm Dinse, Knapp & McAndrew, P.C. Mr. Nolan brings a wealth of legal knowledge and experience to our projects as a higher education attorney. His practice focuses on representing employers and institutions of higher education in employment and student-related matters in civil litigation and administrative proceedings; advising employers and institutions of higher education on the resolution and legal implications of employment and student-related issues on a day-to-day basis; and assisting employers and institutions of higher education in the development and implementation of appropriate policies, handbooks and training programs. Through his collaboration with MHA, Mr. Nolan reviews MHA draft and final reports before submission to clients. More information about Mr. Nolan and his higher education-related practice is available at www.margolishealy.com and www.dinse.com.

ANTHONY B. PURCELL, ASSOCIATE

Anthony B. Purcell has over 27 years of law enforcement experience including 15 years as a Police Chief. Anthony is the current Assistant Vice President and Chief of Police at the University of Alabama at Birmingham since October 2006. He was the former Deputy Chief of Police at The Georgia Institute of Technology for three years, and the former Chief of Police and Director of Public Safety at the University of North Carolina at Charlotte for nine years. He was the former Chief of Police and Director of Public Safety at North Carolina Central University in Durham, N.C. for three years. Anthony started his law enforcement career with the Durham County Sheriff’s Department in Durham, N.C. and was there for nine years.
Anthony is an alumnus of North Carolina Central University, where he graduated magna cum laude in earning a Bachelor’s degree and summa cum laude in earning a Master’s degree. Both degrees are in Criminal Justice. He is a graduate of the prestigious Federal Bureau of Investigation National Academy; the Alabama Association of Chiefs of Police Certification Program; the International Association of Campus Law Enforcement Administrators Executive Development Institute; the Georgia Association of Chiefs of Police Executive Chiefs Training School; and the North Carolina Institute of Government’s Law Enforcement Executive Program. Anthony is an assessor for the Commission on Accreditation for Law Enforcement Agencies (CALEA), and an assessor for the International Association of Campus Law Enforcement Administrators (IACLEA) Loaned Executive Management Assistance Program (LEMAP).

In addition to his law enforcement duties, Anthony is on the Board of Directors for IACLEA serving as the Southeast Region Director. He is a board member for the City of Birmingham’s Crime Stoppers Program and has served on boards in the cities of Charlotte and Durham, North Carolina, respectively. Anthony is a former adjunct instructor in the criminal justice Program at UNC Charlotte, and has served as an adjunct instructor in the criminal justice program at North Carolina Central University, both at the undergraduate and graduate levels. He is also a former adjunct instructor in the criminal justice program at Durham Technical Community College.

Anthony is a member of the International Association of Chiefs of Police (IACP); The International Association of Campus Law Enforcement Administrators (IACLEA); The National Organization of Black Law Enforcement Executives (NOBLE); The Federal Bureau of Investigation National Academy Associates (FBINAA); Alabama Association of Chiefs of Police (AACP); and several other professional organizations, boards and clubs.

**DR. PENNY SHTULL, RESEARCH ASSOCIATE**

Penny Shtull is an associate professor of criminal justice in the Department of Justice Studies at Norwich University in Vermont. She earned a Ph.D. and M.Phil. in Criminal Justice, as well as a M.A. in Forensic Psychology from John Jay College of Criminal Justice in New York City and a B.SW. from McGill University in Montreal.

In addition to her publications in police and criminological journals, Dr. Shtull has served as a consultant for various organizations and state
agencies including the Police Foundation (Washington, D.C.); the New York City Police Department; the Vera Institute of Justice (N.Y.); the Criminal Justice Research Center (N.Y.); the Vermont Center for Justice Research; the Burlington Police Department (VT); the Vermont Department of Corrections; the Chittenden Unit for Special Investigations (CUSI); the Vermont Criminal Justice Training Council; and the Vermont Children’s Alliance and Sexual Assault Nurse Examiner (SANE) Program. In addition, she has served on the Washington County, Vermont Sexual Assault Review Team, the Vermont Department of Corrections Reparative Probation Board, and the Educational Advisory Board at the Northwest State Correctional Center. Professor Shtull is the Immediate Past President of the Northeastern Association of Criminal Justice Sciences (NEACJS) and has served on its Executive Board in various capacities since 1997. In June 2009, she was the recipient of the Northeastern Association of Criminal Justice Sciences Association’s Founders Award in recognition of her service and significant and outstanding contributions to the Association.

THOMAS R. TREMBLAY, ASSOCIATE

Throughout his distinguished thirty year policing career Tom Tremblay has been a passionate leader for the prevention of domestic and sexual violence. He is a national trainer and advisor promoting improved victim services; multi-disciplinary response and investigations; greater offender accountability; and the importance of leadership, policy and training to help end violence against women crimes.

Tom Tremblay is a faculty member of the International Association of Chiefs of Police National Law Enforcement Leadership Institute on Violence Against Women and is an associate for Margolis Healy & Associates. In 2008 Tom was appointed by Vermont Governor James Douglas to serve a three year term as Public Safety Commissioner for the State of Vermont. Tom was Chief of Police for five years in the city of Burlington, Vermont prior to his appointment as Commissioner.

Tom served for over twenty-four years in the Burlington Police Department. In 1986 he was selected as the first director of the department’s Sexual Assault Investigation Unit. Tom led the effort to develop the multi-disciplinary team and earned the reputation as a collaborative, compassionate and relentless investigator. The success of the Burlington unit helped pave the way for a county-wide unit which has been recognized nationally and is now a statewide model for the response to crimes of
sexual violence and child sexual abuse. As Commissioner of Public Safety for Vermont, Tom helped lead the effort to improve Vermont’s response to sexual violence which included the creation of Special Investigation Units for every region of the state.

Tom holds a Bachelor’s Degree in Criminal Justice. He is a graduate of the 183rd Session of the FBI National Academy, the FBI Law Enforcement Executive Development Seminar, the Police Executive Research Forum – Senior Management Institute for Police, and the National Law Enforcement Leadership Institute on Violence Against Women.