



Prepared Statement
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U.S. House of Representatives
Committee on Education and Labor
“Best Practices for Making College Campuses Safe”
May 15, 2007

Chairman Miller, Ranking Member McKeon, Members of the Committee. My name is Steven Healy and I am the director of public safety at Princeton University. I am also the President of the International Association of Campus Law Enforcement Administrators (IACLEA), an association that represents the campus public safety executives at 1,100 institutions of higher education and over 1,800 individual members.

The tragic events at Virginia Tech nearly one month ago have heightened the importance of our continuous efforts to enhance campus public safety at more than 4,000 institutions of higher education serving nearly 16 million students and millions more faculty, staff and visitors. I thank and commend the Committee for holding this important hearing on campus safety best practices.

I want to address several issues related to campus public safety best practices, including on-going efforts to strengthen communications, initiatives to continually raise the level of professionalism within the campus public safety community and efforts to comply with federal crime reporting requirements.

Before I outline these strategies, I want to assure this Committee and the American people that vigorous efforts have been and continue to be underway to enhance safety and security on our nation's campuses. With our partners, such as the International Association of Chiefs of Police, College and University Policing Section (IACP) and several federal agencies, we are continuously vigilant and committed to protecting our students and other community members while simultaneously maintaining the open environment that is the centerpiece of the American higher education experience.

It's important to understand the complex nature of our communities and the evolving responsibilities of campus public safety.

Campuses are not immune from safety threats and other dangers facing our society. We must be realistic about these threats and act proactively to prevent and respond to the inevitable crises and incidents that will arise. Campuses deal with a number of critical challenges today, including problems with high risk drinking, drug abuse, mental illness, including suicide, and various forms of violence against women, including sexual assault. Campus public safety officers are on the front lines, along with other campus administrators, as first responders to many of these situations. As we work to develop comprehensive, coordinated approaches to these, and other problems, there is a growing convergence among fields about the best way to prepare for and address complex health and safety issues on college campuses. Rather than recommending one-size-fits-all solutions, both alcohol, other drug and violence (AODV) prevention programs on the one hand, and crisis planning models on the other, emphasize the need for creating comprehensive plans that are tailored to the culture, setting, and physical environment of each campus.

Essential steps in creating these plans include:

- Working in partnerships with multiple campus and community stakeholders;
- Conducting an analysis of local problems, hazards, structures, assets, and resources; and,
- Consulting the research literature for and creating evidence-based practices.

One way to ensure our colleges and universities are able to prevent, prepare for, respond to, and recover from critical incidents is by providing adequate resources for our campus public safety agencies. These resources must include, as a foundation, the best possible training available and support for adherence to the highest professional standards.

Accreditation

IACLEA recognizes that training and professional standards are crucial to our success in crime prevention and control and critical incident response. Several years ago, we embarked upon a process to establish an accreditation program for campus public safety agencies.

Thanks to our partners in the U.S. Department of Justice, Office of Community Oriented Policing Services (COPS), IACLEA was provided seed monies to begin developing this program. Based on the standards previously established by the Commission on Accreditation of Law Enforcement Agencies (CALEA), we now have a program that supports our commitment to the professionalization of campus public safety.

Our Accreditation program requires participating agencies to conduct an in-depth self-assessment of their policies and procedures and then take significant steps to meet more than 150 campus-specific standards. Some of those standards specifically address critical incident response and we believe that the Accreditation process, in and of itself, enhances an agency's response to all-hazards (see attached article). IACLEA began accepting applications for the program last year and we are confident that many colleges and universities will support their campus public safety agencies seeking Accreditation.

Accreditation sets a strong foundation so agencies are able to plan for other important aspects of campus safety such as communications. Communicating for effective campus public safety involves several inter-connecting spheres of communication and must be approached in a holistic manner.

Communications

First and foremost, we must communicate within our campus communities immediately following the discovery of a critical incident so we are able to provide detailed instructions, maintain order, and control rumors. Secondly, we must communicate with

those responsible for managing and resolving a critical incident: the emergency first responders. For the former, our strategy must consider the unique characteristics of campuses and the fact that we are open, vibrant, active communities, with people always on the move, engaging in academic, social and other activities.

Of particular interest is the need for mass, emergency notification systems that have appropriate capacity, security, redundancy and reliance to reach our community members using multiple forms of communication that do not allow for a single point of failure. These systems must be able to reach community members with voice messages, text messages and emails, in addition to other systems that may already be in place, such as web sites, horns, or sirens. No single method of communication is sufficient.

Secondly, we must communicate effectively with our emergency response partners. This type of communication requires interoperability – that is, equipment, protocols and governance structures that allow agencies to speak to each other in real time. Funding provided by Congress through the U.S. Department of Homeland Security and the U.S. Department of Justice aims to enhance interoperability at several levels, yet colleges and universities are not explicitly mentioned as potential grant recipients for this funding. Specifically including campus public safety agencies in existing federal and state programs of emergency preparedness and law enforcement response would address the varying capabilities of campuses to talk to their counterparts in the larger community during critical incidents.

While interoperable equipment is important, so is the need to have established systems, protocols, agreements, and joint training programs that enable multiple agencies to respond in a rapid, effective, seamless fashion. With the support of a U.S. Department of Homeland Security grant, IACLEA created a “*Guide to Strengthening Communications between Campus Public Safety Departments and Federal-State-Local Emergency Response Agencies*”. This Guide recommends that campuses do the following:

- Assess local responsibilities and resources available;
- Determine the state of local emergency communications equipment and training and make recommendations for improvements;
- Develop and maintain a written Emergency Communication Plan that is consistent with federal NIMS/ICS requirements;
- Develop mutual aid agreements and/or memoranda of understanding in cooperation with local law enforcement and other emergency response agencies;
- Train and conduct exercises to validate, enhance, or improve all procedures resulting from developed mutual aid agreements; and,
- Develop and improve communications skills and networks.

To support these goals, IACLEA, with funding from DHS, developed a critical incident management course that involves simulation based training. In its first year of operation, the program has trained more than 700 campus public safety officers and their emergency response partners.

In addition to the on-going challenges of crime prevention, crime control, and critical incident response, colleges and universities must ensure they comply with Federal crime reporting requirements, specifically, the Crime Awareness and Campus Security Act of 1990, known as the Clery Act.

Clery Act Compliance

The Act requires colleges and universities that receive federal Title IV funding to disclose campus crime statistics and crime prevention information to the public and the Federal government. IACLEA has served as a resource to the U.S. Department of Education by providing feedback on changes to the Clery Act and training for our members. IACLEA has co-sponsored a number of Clery Act training and compliance workshops and seminars at our Annual Conference, Regional Conferences and other venues.

The Jeanne Clery Act impacts many areas of campus operations and administration; therefore, it is important for colleges and universities to take a collaborative approach to compliance. To further the collaborative model, this year, Security on Campus, an organization devoted to improving campus safety, teamed with IACLEA and the IACP under grant funding from the U.S. Departments of Justice and Education, to offer a series of Clery Act compliance training sessions across the U.S. IACLEA is providing subject matter expert instructors for these courses.

The Clery Act provides students and their families with accurate, complete and timely information about safety on campus, so they can make informed decisions about their safety and security. Our job as the professional association representing campus public safety is to provide our members with the latest training and guidance so they can deliver this information to students, parents and the Federal government. IACLEA is committed to working with our members and with other interested groups to promote Clery Act compliance and training in the future.

IACLEA believes that a current proposal to expand the Clery Act to include additional reporting requirements under a broad definition of "campus law enforcement emergencies," while well intended, is far too subjective and contains a number of problematic requirements. We have submitted alternative language for this bill and stand ready to assist the U.S. Congress in enhancing campus public safety.

Summary

Providing adequate safety and security for our nation's campuses is a critical responsibility that requires action by all of us. Campuses are diverse settings, and there

is no one-size-fits-all initiative that will work at every institution. Each campus must undertake a comprehensive planning process involving multiple campus and community constituencies, working together to analyze their local problems and assets and developing plans that use multiple, coordinated policies, protocols, and programs. IACLEA has developed several resources that can significantly contribute to these efforts, but we can do more with additional support from the Federal government.

While these existing efforts by IACLEA and other professional associations and our partners in the Federal government lay important groundwork, they should be supplemented to ensure they are:

- Expanded to all campuses;
- Include more partners on campus, as well as local and state partners;
- Supported with funding for appropriate equipment and other infrastructure development;
- Informed by training, technical assistance, and up-to-date information; and,
- Practiced regularly on all campuses.

Recommendations

While IACLEA currently reaches nearly half the traditional higher education institutions, we need to ensure all colleges and universities are committed to and have access to high quality information, best practices, and training. Greater Federal, state and local support for campus public safety agencies – both at public or private institutions – would provide additional opportunities.

First among my recommendations is the need to establish a National Center for Campus Public Safety. The need for a National Center was a consensus recommendation from a Summit held in 2004. The National Center would support research, information sharing, best and model practices, and strategic planning to enhance campus public safety.

For example, in the aftermath of the horrific events at Virginia Tech on April 16, many campuses began examining mass notification systems. Unfortunately, there was little information available to help guide those decisions. A National Center would fill that gap by brokering innovative, forward-looking research for campus public safety needs. The National Center would also aggressively promote the adoption of professional standards, like those in the IACLEA Accreditation Program. The Center would be an invaluable resource for all who have a stake in campus public safety and thus the success of our colleges and universities.

Secondly, we are working with our partners in the FBI, the U.S. Secret Service, and the Department of Education to expand previous studies of middle and high school aged shooters, to take a deliberate, campus-focused look at rampage shooting incidents at

colleges and universities. This examination and the lessons learned from it will surely result in the identification of best practices. I would like to thank the FBI Office of Law Enforcement Coordination for facilitating this important initiative.

Finally, IACLEA will work with the national associations of higher education and other partners to adopt a four-point risk management strategy that we believe may help us prevent future tragedies:

- Aggressively promote the use of IACLEA's Threat & Risk Assessment tool, developed with federal DHS grant support, to help campuses identify and prioritize vulnerabilities tied to known and potential threats. For this, IACLEA will need additional resources from DHS beyond what our current grant allows.
- Collaborate with others to create behavioral threat assessment models. These models should be centered on multi-disciplinary teams, comprised of student affairs professionals, counselors and psychologists, substance abuse professionals, and campus public safety administrators working together.
- Fast track our efforts to develop a comprehensive tool to assist campuses in evaluating their physical security environments. This tool will help campuses make sound decisions about security technology and mass notification systems.
- Ensure that rapid response training is available to campuses that need it. The Bureau of Justice Assistance has pledged their help in this important endeavor.

We believe this four-point approach addresses potential gaps that may exist on some campuses and establishes a framework to systematically address other safety and security challenges on our campuses.

Conclusion

For the past 49 years, IACLEA has worked to advance campus public safety. We understand the vital role our colleges and universities play in ensuring democracy throughout the world. We will continue to be an advocate for the more than 30,000 public safety officers serving over 4,000 unique communities. Advancing campus public safety is a shared responsibility and requires efforts from all of us. We must all work to ensure we eliminate the fragmentation and isolation of campus safety initiatives and adopt only those activities that are founded in evidence-based best practices.

Thank you for your commitment to this important issue. I would also like to thank DHS, the FBI, the Justice Department and the Department of Education for their support, along with the many state and local agencies, who are our partners. These partnerships are vital to fulfilling our promise to ensure that every campus community remains safe and open.

I appreciate the opportunity to contribute to this important and ongoing dialogue.

1 Attachment

Accreditation Standards and Critical Incident Management

Recent occurrences in the United States and Canada have underscored the potential for catastrophic events on college and university campuses. Whether man-made, natural or technological in nature, catastrophic events present unique challenges to those responsible for the well-being of students, faculty, staff and visitors. Events such as Hurricane Katrina, in the fall of 2005, illustrate the potential for catastrophes to reach far beyond geopolitical boundaries and render great swaths of infrastructure inoperable. The tragic shootings at Dawson College in Montreal and more recently, at Virginia Tech, demonstrate the sudden, unpredictable, and devastating nature of some criminal acts. These events point out the need for seamless emergency operations procedures at institutional, municipal, regional, state, and national levels. Effective, large-scale emergency operations can only occur after careful consideration and planning have taken place at each level.

IACLEA's efforts to launch an accreditation program began in 1999. IACLEA conducted a member needs assessment survey, which identified the development of a campus public safety agency accreditation process as a priority. The Association created an Accreditation Committee in 2001 and charged it with reviewing existing standards and developing an accreditation process. In 2003, IACLEA sought and was awarded a grant from the Office of Community Oriented Policing Services (COPS) within the U. S. Department of Justice. These funds were designed to defray the start-up costs of creating and implementing the accreditation program. A second COPS grant was secured in 2005 to continue the support of the program through the pilot program phase. The IACLEA Accreditation Program was officially launched in February 2006.

The Accreditation Committee, recently reformulated as a Commission, is the Association's governing body for the IACLEA Accreditation Program. The Commission consists of twelve voluntary members, nine of which are IACLEA members. Particular care is taken to ensure that the Commission membership is representative of the diversity of the Association, including representatives of both two- and four-year institutions, sworn and non-sworn agencies, and public and private institutions. Additional members are drawn from allied associations, including the National Association of College and University Business Officers, the National Association of Student Personnel Administrators, and the American Council on Education.

An often cited benefit of the accreditation process is that the standards provide timely and topical guidance in the "best practices" of public safety management and operations. The standards address areas such as policy development, selection of personnel, training, discipline, use of force, patrol and traffic operations, communications, record keeping, property and evidence handling, transportation and detention of individuals, and emergency response planning.

Generally, the standards identify "what" an agency must do, not "how" to do it. The majority of standards require a "written directive" as a proof of compliance to affirm the agency's commitment to the standard. Generally, any document that is binding on agency personnel and serves to direct, guide, or govern their activities may be used to meet the written directive requirement. The following standard, addressing emergency response planning, requires a written plan:

46.1.2 *The agency has a written “All Hazard” plan for responding to critical incidents such as natural and man-made disasters, civil disturbances, mass arrests, bomb threats, hostage/barricaded person situations, acts of terrorism, and other unusual incidents. The plan will follow standard Incident Command System (ICS) protocols, which include functional provisions for: command, operations, planning, logistics, and finance/administration.¹*

Subsequent standards provide more specific direction concerning the development of a comprehensive and effective emergency operations plan. It is noted that the “*command function*” should address issues such as establishing a command post, mobilizing personnel, preparing a staging area, requesting outside assistance, and maintaining media relations. The “*operations function*” should attend to establishing perimeters, conducting evacuations, controlling traffic, and providing on-scene security. The “*planning function*” should address preparing an incident action plan, collecting and disseminating intelligence, and planning for demobilization, while the “*logistics function*” should concentrate on communications, transportation, medical support, and equipment and supplies. The standards also require the periodic inspection of the agency’s emergency response equipment to ensure its operational readiness.

Not only does the IACLEA Accreditation Program promote the highest professional standards for campus law enforcement and protective services, but it is committed to enhancing critical incident management through the creation of a web-based Campus Preparedness Resource Center. Funded under a federal Department of Homeland Security grant, the goals of the web based Resource Center are to develop and disseminate resources to strengthen the capacity of campus public safety departments to plan for potential WMD/terrorist threats, to encourage participation in IACLEA’s Incident Command System training program, and to disseminate a strategic vision for campus public safety training. Among the online resources available to the members of the campus public safety profession is a “Model Campus Emergency Operations Plan Guidelines” resource, which offers a sample EOP, emergency support functions and incident specific appendices and other sample documents that may be edited and adapted for use at any institution. This guide can provide a framework to develop an effective and compliant “All Hazard” plan.

¹ CALEA, Standards for Law Enforcement Agencies, 5th Edition, Fairfax, VA