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## FERRARIS INVESTIGATIONS & CONSULTING, LLC

February 4, 2022

Dr. Laurie Chesley  
President  
Central Oregon Community College  
2600 NW College Way  
Bend, Oregon 97703

**RE: Review of Central Oregon Community College Campus Safety Services**

Dear Dr. Chesley:

Thank you for the opportunity to conduct a comprehensive review of campus safety services at Central Oregon Community College (COCC). Accompanying this letter is a detailed report of the review, including recommendations for consideration.

This review, which commenced in June 2021, was conducted with the primary goal of providing a framework allowing for the transition of the existing "Campus Public Safety Department" from a "law enforcement" orientation to a "safety and security" orientation. Another goal of the review was to help create an environment fostering a climate of teamwork and collaboration, not only within the campus safety department, but with and alongside of college and public safety stakeholders.

During this process, dozens of documents including but not limited to previous reviews, records, reports, crimes/calls for service data, memoranda, media articles, job descriptions, and policies and procedures were reviewed. Twenty-four stakeholders including COCC board members, faculty, staff (including campus safety staff), students, public safety and law enforcement

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representatives, and other college campus safety officials were consulted and interviewed. Visits were made to COCC campuses and facilities.

As noted in the accompanying report, several topic areas were identified, reviewed and discussed with stakeholders and subject matter experts. Concluding that work, several recommendations have been made for you to consider in the continuing transformation of the Campus Safety Department to help align the department with laws and industry best-practice.

Throughout this review, I found a wonderful collection of people who are invested in the college, its future and its success. It was a pleasure to meet and work with the members of the COCC community who assisted me with this project, including board members, faculty, staff, and students.

Please contact me directly if I can assist you and COCC any further or to answer any questions about this review.

Sincerely,



**JAMES C. FERRARIS**  
Owner/Principal  
Ferraris Investigations & Consulting, LLC

***Central Oregon Community College***  
***Campus Safety Review***

**Prepared by**

***JIM FERRARIS***

Owner/Principal  
Ferraris Investigations & Consulting, LLC

**February 2022**

Table of Contents

**INTRODUCTION .....4**

**OVERVIEW .....5**

**COCC MULTIPLE CAMPUSES .....5**

**OREGON SENATE BILL 576 – “KAYLEE’S LAW” .....6**

**TITLES OF DEPARTMENT PERSONNEL.....7**

    RECOMMENDATIONS ..... 7

**UNIFORMS – EQUIPMENT – VEHICLES.....8**

    UNIFORMS ..... 9

*Recommendations* ..... 9

    EQUIPMENT ..... 9

*Recommendations* ..... 10

    VEHICLES ..... 11

*Recommendations* ..... 12

**RECRUITMENT, HIRING & RETENTION..... 13**

    RECOMMENDATIONS ..... 14

*Job Descriptions* ..... 14

*Hiring* ..... 14

*Leadership Positions* ..... 16

**STAFFING ..... 16**

    RECOMMENDATIONS ..... 17

**AUTHORITY ..... 18**

    RECOMMENDATIONS ..... 19

**SCOPE OF WORK, DUTIES AND RESPONSIBILITIES ..... 20**

    RECOMMENDATIONS ..... 20

*Safety/Security Role* ..... 21

*Training Role* ..... 22

**REMOTE CAMPUS LOCATIONS ..... 22**

    RECOMMENDATIONS ..... 23

**TRAINING RECOMMENDATIONS ..... 24**

    ON-BOARDING ..... 24

    GENERAL TRAINING ..... 24

    CONTINUED TRAINING ..... 25

**POLICIES & PROCEDURES ..... 25**

    RECOMMENDATIONS ..... 26

**CRIME/CALLS FOR SERVICE DATA.....27**  
RECOMMENDATIONS.....27

**LAW ENFORCMENT/PUBLIC SAFETY CAPABILITIES .....28**  
RECOMMENDATIONS.....29

**CAMPUS SAFETY DEPARTMENT REPORTING .....29**  
RECOMMENDATIONS.....30

**COMPLAINTS AGAINST CSD MEMBERS .....31**  
RECOMMENDATIONS.....31

**WEBSITE .....31**  
RECOMMENDATIONS.....31

**EMERGENCY PREPAREDNESS & ENVIRONMENTAL HEALTH & SAFETY.....32**  
RECOMMENDATIONS.....33

**CAMPUS SAFETY ADVISORY COUNCIL .....33**  
RECOMMENDATIONS.....34

**PROFESSIONAL AFFILIATIONS – ACCREDITATION .....34**  
RECOMMENDATIONS.....35

**STAKEHOLDERS AND CONTRIBUTORS .....36**

**REFERENCES.....38**

## INTRODUCTION

Providing a safe and secure environment for students, faculty, staff and visitors is a primary goal of Central Oregon Community College (COCC). To accomplish that goal, COCC has had a Campus Public Safety Department (CSD) for many years. Department leadership, staff, duties and responsibilities have ebbed and flowed over the years.

Oregon Senate Bill 576, known as 'Kaylee's Law' originated in the aftermath of the 2016 murder of COCC student Kaylee Sawyer, committed by COCC Security Officer Edwin Lara. This legislation, signed into law in June 2019, defines roles and responsibilities of private security professionals and private security providers. Additionally, it sets out regulations on uniforms, vehicles and equipment of those security personnel to easily differentiate campus safety and security personnel from law enforcement officers.

Previous COCC leaders commissioned reviews of COCC's Campus Public Safety Department and Emergency Preparedness in 2015, 2016 and 2019. Each review included a host of findings and recommendations. A constant theme was apparent in those reviews – the Campus Public Safety Department was operating like a small law enforcement agency.

In July 2019, Dr. Laurie Chesley was appointed COCC President. Issues within the Campus Public Safety Department rose to the attention of Dr. Chesley, who began to closely examine the department. It was clear to COCC leadership that the Campus Public Safety Department needed to transition its model from a "law-enforcement" mindset to a "safety and security" mindset fostering a climate of teamwork and collaboration within the department, along with campus and law enforcement stakeholders.

It was upon that premise Dr. Chesley contracted with Ferraris Investigations and Consulting, LLC to conduct a review of the current Campus Public Safety model and make recommendations to move the department forward, in line with the vision of maintaining a safe and secure campus enjoyed by students, faculty, staff and visitors.

## OVERVIEW

As part of the review, informational meetings and interviews were held with 24 stakeholders and contributors. Interviewed were members of COCC faculty, staff, campus safety, student body, board members, law enforcement representatives, directors of other campus safety departments in Oregon, and the Deschutes County District Attorney.

During the review, the following areas were focused upon. Stakeholder input was sought, and recommendations are made for each area reviewed.

- Titles of Campus Safety Personnel
- Recruitment and Hiring of Campus Safety Personnel
- Uniforms and Equipment Carried/Used by Campus Safety Staff
- Vehicles Operated by Campus Safety Staff
- Authority of Campus Safety Staff
- Scope of Work, Duties and Responsibilities of Campus Safety Staff
- COCC Remote Campus Locations
- Staffing of the Campus Safety Department
- Training of Campus Safety Staff
- Campus Safety Department Policy and Procedure
- Campus Safety Relations with Local Law Enforcement
- Crime/Calls for Service at COCC Campuses
- Reporting of Incidents by Campus Safety
- Complaints Against Campus Safety Department Members
- Campus Safety Presence on COCC Web and Social Media Sites
- Campus Environmental Health & Safety and Emergency Preparedness
- Campus Safety Advisory Council
- Campus Safety Professional Affiliations

## COCC MULTIPLE CAMPUSES

There are 4 campuses in the COCC system:

1. Bend (Main)

2. Redmond
3. Prineville
4. Madras

Staff at the main campus enjoys a positive working relationship with members of the Bend Police Department. Dr. Chesley and Bend Police Chief Mike Krantz have a productive and collegial relationship.

The directors for the Redmond, Prineville and Madras campuses enjoy positive working relationships with their respective city police departments as well. Beyond law enforcement, it will be imperative for the new CSD Director and staff to build relationships within those campuses and maintain a presence to achieve the goals of both the college and the department.

#### **OREGON SENATE BILL 576 – “KAYLEE’S LAW”**

COCC must ensure that its Campus Safety Department and personnel are in full compliance with Oregon Senate Bill 576. This law, which became effective in 2019 requires the following:

1. COCC must ensure that a criminal records check is conducted on each member of the Campus Safety Department (CSD).
2. Vehicles used by CSD must be equipped with a global positioning system (GPS) as defined in ORS 163.715, retaining GPS data for at least 90 days.
3. Vehicles used by CSD must be equipped with a video camera that records the scene within the vehicle, retaining the recording for at least 90 days; or CSD must have a dispatch system for which a record of calls is maintained for at least 90 days.
4. CSD uniforms must be easily differentiated from those of Oregon certified law enforcement officers with differentiation including, but not limited to: prominent designation of “campus security” or prominent use of school colors or school logo.



5. CSD vehicles must be clearly identified as campus vehicles on the front of the vehicle; must not use red and blue light bars; must not use bumpers intended to ram another vehicle to cause a stall; and must not use cages.
6. CSD members do not have "stop and frisk" authority under Oregon law.

## TITLES OF DEPARTMENT PERSONNEL

It is important for the title of the department and its personnel to accurately reflect roles and responsibilities. Previously, the department had been named the Campus Public Safety Department. "Public" was a descriptor that many stakeholders believed was unnecessary because the purpose and function of the department was to keep the *campus* safe and secure, as opposed to areas off campus, which are the responsibility of local law enforcement. A clearly stated title such as "Campus Safety Department" is more on-point to the department's core function.

Most stakeholders were in favor of titles of personnel that aligned with job duties. For instance, the leader or person in overall charge of the department is a department director and should be called "*Director*" instead of using other police or military-like titles such as "Chief"; those with supervisory responsibility should be called "*Supervisory Campus Safety Officer*"; and those performing campus safety and security duties should be called "*Campus Safety Officer*". This is consistent with many of the campus safety departments within the Oregon community college system.

## Recommendations

**Department title:** The department should be titled the *Campus Safety Department (CSD)*

## **Titles of Personnel:**

The person in overall charge of the Campus Safety Department and its personnel should be titled *Director*.

The person responsible for performing campus safety and security duties and for day to day supervision of staff should be titled *Supervisory Campus Safety Officer*.

The person primarily responsible for delivery of campus safety and security services to COCC students, faculty, staff and visitors should be titled *Campus Safety Officer*.

The person responsible for campus safety staff duties and duties related to Environmental Health and Safety should be titled *Senior Campus Safety Officer*.

The person responsible for handling telephone and radio communications to and from Campus Safety personnel about the COCC community and responsible for performing administrative duties for the Campus Safety Department should be titled *Campus Safety Dispatcher/Administrative Assistant*.

## **UNIFORMS – EQUIPMENT – VEHICLES**

Stakeholders weighed in heavily on these topics. It is evident that how CSD staff are presented, the equipment carried and used by members of CSD and the appearance of CSD vehicles is important to stakeholders across the spectrum.

Some of what was addressed by stakeholders about uniforms, equipment and vehicles is driven by statute. Oregon Senate Bill 576 mandates specific requirements within these topic areas. The remainder of concerns of stakeholders are driven by the COCC community, in what they want in terms of appearance and presentation of their Campus Safety Department personnel.

## Uniforms

Any uniform worn by CSD members must conform to Oregon Senate Bill 576. Generally, stakeholders were supportive of CSD personnel wearing a uniform that is clearly distinguishable from a law enforcement uniform. Stakeholders recommended that CSD uniforms have utility, be comfortable and weather durable, allowing for visibility and for the quick, clear identification of the person as a member of the Campus Safety Department.

## Recommendations

*Campus Safety Officers:* The current uniform consisting of blue polo shirt, gray pants, black nylon web belt and yellow protective/identifying vest has proper utility and is acceptable and appropriate, conforming to SB 576. Proper weather-related outerwear should be issued to each member. All shirts and outerwear should be clearly marked with the COCC logo or embroidered badge, member's name and letters and shoulder patches signifying the person as a member of CSD.

*Administrative Staff:* The Director and Supervisor should have the same uniform as officers and have the same equipment available to them, although dependent upon schedule, the Director should have the discretion to wear business attire.

*Campus Safety Dispatcher/Administrative Assistant:* The campus safety dispatcher/administrative assistant should wear the CSD polo shirt and pants.

## Equipment

Stakeholders believed equipment carried by CSD should be lawful, have utility and be deployed for the purpose of the safety of the COCC community, including the safety of campus safety officers.

Some Oregon community college campus safety departments do allow their personnel to carry handcuffs, however most stakeholders said they did not think handcuffs were a necessary piece of equipment for campus safety officers since campus safety officers do not have law enforcement arrest authority. By statute, campus safety officers are limited to private person arrest authority like any other citizen.

Whether CSD personnel should carry "pepper spray" was a topic of much discussion. The carry of such a tool is clearly dependent upon a policy decision by COCC leadership. Some stakeholders did not support carry of "pepper spray", while others believed that such carry of pepper spray is appropriate because any citizen can lawfully carry it. Further, some stakeholders suggested that it could be of help if campus safety personnel carried it for the purpose of defending themselves or a third person from physical harm, or when used to protect a person from a vicious animal. Regardless, stakeholders were clear that if such a tool were allowed by COCC policy, CSD members must be properly trained in not only how and when to use it, but be trained on the law governing such use, and be guided by clear policy.

## **Recommendations**

Officers, Supervisor and Director should be issued the following equipment:

- COCC identification credential
- Portable radio
- First-aid kit including bleeding control devices
- Naloxone
- Smartphone

While it is recommended that Campus Safety Officers be issued and have the ability to use pepper spray when necessary in extreme circumstances, COCC leadership should make a policy decision on the carry and use of pepper spray by CSD members, including requisite training.

It is recommended that handcuffs not be carried by CSD personnel.

Campus Safety personnel should always wear the COCC identification credential while on duty.

## Vehicles

Generally, stakeholders support the type of vehicles and vehicle markings COCC currently uses for campus safety purposes. Most stakeholders preferred the AWD pickup trucks, primarily because of the softer appearance, utility and ability to carry fire suppression equipment, however incorporating some smaller AWD sport utility vehicles into the fleet was also acceptable to stakeholders.

Some stakeholders suggested adding small utility vehicles like the "Gator" or "Polaris" to the fleet to traverse the main campus. There is utility for such vehicles, however that is a decision best left to CSD leadership.

Use of bicycles was also suggested, primarily in the good weather months. However, the elevation, hills and terrain of the main campus is not likely conducive to bicycle use and little efficacy would be gained using bicycles at remote campuses.

Campus Safety vehicles must comply with Oregon Senate Bill 576 regarding the following:

- Vehicles must be equipped with a global positioning system (GPS) device, as defined in ORS 163.715, for which global positioning data is retained for at least 90 days;
- Vehicles must be equipped with a video camera that records the scene within the vehicle and for which video recordings are retained for at least 90 days; or COCC must have a dispatch system for which a record of calls is maintained for at least 90 days.
- Vehicles must be clearly identified as campus vehicles on the front of the vehicle.
- Use of red and blue lights, cages and push bumpers is prohibited.

Currently, the department vehicles are outfitted with a GPS based tracking device meeting the GPS requirement of SB 576. However, the department

does not have a vehicle video camera recording system, nor does it have a dispatch system, both must maintain records for 90 days; one or the other is required, in addition to the GPS system under SB 576.

To meet the requirements of a "dispatch system", it appears campus safety previously used a "spreadsheet" system to capture data as entered by either a dispatcher or campus safety officer. It was discovered that the programming was faulty, so its use was suspended and not replaced.

## Recommendations

### **Motorized Vehicles**

COCC Leadership should consider a CSD fleet consisting of:

- AWD Pick-Up trucks
- AWD sport utility vehicles like Ford Escape or Toyota RAV4
- Small utility vehicles like AWD Polaris or Gator

Trucks should be equipped with fire suppression apparatus.

All motorized vehicles should be marked with the CSD logo clearly identifying the vehicle as part of the fleet of COCC and Campus Safety Department, deleting "Public" from the graphic; markings must conform to SB 576. Each vehicle should be equipped with:

- First-aid kit, including bleeding control devices
- AED
- Naloxone
- Fire Extinguisher
- Radio
- Traffic cones
- Spotlight
- Amber rooftop light bar with directional arrow lighting and side alley lights
- Other equipment and tools as determined by CSD leadership

To fully comply with SB 576, in addition to the existing GPS tracking system, Campus Safety must add the following equipment to the vehicle fleet: a video camera in the vehicle that records the scene within the vehicle and for which video recordings are retained for at least 90 days; or Campus Safety must have a dispatch system for which a record of calls is maintained for at least 90 days.

The current vendor of the department's GPS tracking system does make a video camera for in-vehicle mounting that does record the interior and exterior scenes of the vehicle. Such a system should be explored for SB 576 compliance.

## **RECRUITMENT, HIRING & RETENTION**

Stakeholders identified a strong "law enforcement" centric culture within the Campus Public Safety Department. Such a culture morphed into an "us vs. them" mindset by some previous members of the Department, while some previous campus safety officers had utilized employment at COCC as a steppingstone to a law enforcement career.

COCC leadership and stakeholders have expressed a clear desire to change the culture within CSD. The goal is to move away from an "enforcement" orientation within CSD and hire people into CSD positions who essentially are good communicators, value integrity, enjoy working with people and understand their role is to serve the overall COCC community.

The Department is ripe for such a change. A current recruitment for a Campus Safety Director is underway. As the Department roster continues to be filled, it will be imperative for COCC to recruit, identify, hire and train the right people with the right skills for these jobs.

## Recommendations

### Job Descriptions

The current job descriptions for campus safety personnel have been updated and refined to reflect the new direction of the Department. The job descriptions set out specifics as to qualifications, requirements and necessary knowledge, skills and abilities of candidates. Any job description for positions within CSD should reflect the COCC commitment to diversity, equity and inclusion.

Titles for campus safety positions in job descriptions should be updated to reflect the recommendations made under "Titles of Department Personnel".

### Hiring

The Campus Safety positions are critical to the security, safety and success of the COCC community. While the current COCC recruiting and hiring processes can be followed, some additional recommendations are made.

#### *Pre-employment interview/selection/testing*

##### Interview

As part of any CSD hiring process, a pre-employment interview should take place. The interview panel should consist of a combined group of stakeholders from COCC administration, student community, college faculty, college staff and both line and leadership members of CSD.

Interview questions for candidates should be scenario and behavior/outcome oriented, to focus on where the candidate has been, where the candidate is going and how does the candidate fit into the COCC community, while exploring the integrity and ethics of the candidate.

Candidate experience is a critical piece of the hiring process. Candidates with a "customer service" mindset would do well at COCC. While a



candidate with little to no experience in the public safety or first responder field may materialize, COCC may be better served and should not discount focusing on candidates with a public safety/first responder background, such as experienced or retired police officers, firefighters, 911 telecommunicators, military and other public safety professionals. Candidates wishing to use this position as a steppingstone or an entry point to a future law enforcement career may not be the best fit for COCC.

Because written communication is an integral component of these campus safety jobs, writing samples should be obtained from candidates and evaluated as part of the hiring process.

#### **Background Investigation**

A professional, in-depth background investigation should be conducted on each candidate given a conditional offer of employment. The background investigation should be conducted by a competent background investigator with experience in the public safety/first responder discipline, with the investigation based upon a detailed statement of personal history submitted by the candidate. The background investigation also should determine if the candidate meets the DPSST minimum moral fitness standards for private security certification and possesses the integrity and ethics necessary for the position. Additionally, as allowed by law, record checks on driving history, criminal records and credit history should be conducted on candidates undergoing a background investigation.

#### **Pre-employment Psychological Testing**

Professional, in-depth pre-employment psychological testing should be conducted on each candidate given a conditional offer of employment and successfully passing a background investigation to further determine suitability for the position. The testing should be conducted by a licensed psychologist/psychiatrist with a background in public safety/first responder testing. The testing can be based upon a "Campus Safety" profile developed jointly by COCC/CSD leadership and the psychologist. The background investigation of a candidate should be reviewed by the psychological/medical professional prior to the testing of the candidate.

## **Leadership Positions**

As described by stakeholders during this review, many of the weaknesses and challenges within the campus public safety department can be attributed to a lack of leadership, poor communication and manifestation of an "us against them" mindset and culture existing within the department, particularly when interacting with students, faculty and staff. The department had siloed itself somewhat from the COCC community.

Those hired into CSD positions must all lead by example, not just leave leadership to the Director and Supervising Officer. Each must embrace the mission, vision and values of the college and communicate those by example, through word and deed. CSD leaders must lead, ensuring that all CSD members adopt and exercise this mindset when performing their work and interacting with the COCC community.

Minimum qualifications for the Campus Safety Director position should include but not be limited to:

1. Bachelor's Degree from an accredited college or university
2. Five years progressively responsible public safety or security related management or supervisory experience
3. Must successfully pass a pre-employment background investigation
4. Must successfully pass a pre-employment psychological examination

## **STAFFING**

Currently, all campus safety officers but one have left COCC employment. COCC has been contracting with a private security service to provide security patrols at the main campus. The sole remaining campus safety officer has been performing limited campus safety and security functions and has been focused upon providing environmental health and safety work at all COCC campuses.

Staffing of personnel can be accomplished to meet the mission of CSD by utilizing a combination of COCC CSD staff, outside security contracts and continuation of the Campus Resource Officer (CRO) program in partnership with the Bend Police Department. The CRO position at the main campus

has been vacant for some time due to staffing shortages within Bend PD. However, Bend Police Chief Mike Krantz has expressed his clear desire to fill the COCC CRO position as soon as BPD's staffing can handle the additional workload.

Having a cadre of CSD personnel working Monday through Friday, during daytime and evening hours will provide necessary resources for the benefit of COCC. Nights, weekends and holidays should be staffed with a private security contractor to conduct patrols and handle calls for service during contract hours, with certain CSD staff "on-call" 24/7 as the COCC "Person-in-Charge". COCC should endeavor to staff the Campus Safety Department in a manner that supports the effective and efficient provision of safety and security services to the COCC community. Regardless of the staffing model adopted, it must be understood that it will take time to achieve optimal staffing, and the filling of staff positions will likely be incremental in nature.

## Recommendations

The following staffing model is offered for consideration:

CSD staffing should be maintained during the business week, Monday through Friday during day and evening hours.

CSD positions could be staffed as follows:

- (1) *Director:* Day shift M-F
- (1) *Campus Safety Dispatcher/Administrative Assistant:* Day shift M-F
- (2) *Campus Safety Officer:* Day shift M-F
- (1) *Senior Campus Safety Officer:* Day shift M-F
- (1) *Supervisory Campus Safety Officer:* Split shift/Swing shift M-F
- (2) *Campus Safety Officers:* Swing Shift

Specific work hours should be identified in conformance with COCC policies and existing collective bargaining agreements.

Graveyard & Weekend Staffing:

Contract with private security patrol services to continue the function of premises security patrols.

Law Enforcement Services:

Contract with Bend PD for a Campus Resource Officer (CRO) at the Bend Campus during day shift M-F

Organizational Reporting:

Because of the critical services campus safety provides contributing to the overall safety, security, health and success of the college, it is recommended that the CSD Director report directly to the COCC President.

## AUTHORITY

Authority of campus safety personnel was an area stakeholders weighed into heavily. Stakeholders spoke of campus safety personnel having an "us vs. them" mindset and operating with an "enforcement" mindset as opposed to operating with "compliance" as the intended result.

Campus safety officers are not law enforcement officers under Oregon law, and as such, have no law enforcement authority.

Campus safety personnel gain authority to perform some duties from the COCC Board as allowed by Oregon law. Such authority is very limited in nature and scope and includes the ability to ensure compliance regarding traffic and parking regulations adopted by the COCC Board, to act as a "person in charge" regarding trespass authority, and the exclusion of those persons from COCC property acting outside of compliance with campus policies and regulations.

It should be clearly understood that pursuant to Oregon law, campus safety officers have no greater authority than any private person in making a private person arrest or using physical force to make a such an arrest.

Clearly, actions by campus safety officers including parking enforcement, private person arrests and use of force to make such an arrest, are subject to policy decisions to be made by COCC leadership.

The Deschutes County District Attorney has cautioned that any private person arrest by Campus Safety officials will be reviewed for compliance with private person arrest statutes; to determine if the campus safety officer was acting lawfully. For instance, a consideration would be whether a *reasonable person* believed that the campus safety officer was a police officer by virtue of uniform, car, words and conduct of the campus safety officer. In such a situation, the District Attorney believes that there is a risk that the campus safety officer could be charged with the crime of impersonating a police officer.

Oregon Senate Bill 576 prohibits any "stop and frisk" authority as described in Oregon Revised Statutes.

Oregon Senate Bill 576 requires that campus safety officers making a "private person arrest" as defined in ORS 133.225, shall promptly notify a law enforcement agency with jurisdiction over the area in which the arrest took place; and additionally, campus safety officers may not retain evidence related to the arrest except for the purpose of providing the evidence to the law enforcement agency over the jurisdiction in which the arrest took place.

## Recommendations

COCC leadership should review all authority granted to campus safety for statutory compliance.

COCC leadership should make a determination on what authority is granted to campus safety officers, including whether to authorize campus safety

officers to make private person arrests under ORS 133.225 in extreme circumstances.

Any affirmative determination should give clear guidance to campus safety personnel on expectations of them regarding intervening when necessary to protect a life, protect themselves, or making a private person arrest.

## **SCOPE OF WORK, DUTIES AND RESPONSIBILITIES**

The scope of work, duties and responsibilities of CSD should be based upon the concepts of ensuring safety and providing service, support and training to the COCC community. All CSD members should endeavor to foster a climate of teamwork and collaboration, not only within the department, but should engage campus and law enforcement stakeholders in the same manner. This can be accomplished by CSD members positively engaging and interacting with the COCC community, performing a variety of safety and security functions on campus along with providing safety and security oriented leadership and training to the COCC community.

The Memorandum of Understanding (MOU) between COCC and the City of Bend sets out specific commitments by both the college and the City about the scope of work, duties and responsibilities of COCC's campus safety endeavors. Further, the MOU sets out specific information on assistance to be provided to COCC on criminal issues by the City and Bend PD.

### **Recommendations**

The Campus Safety Director should work to ensure that the scope of work, duties and responsibilities of campus safety staff conform to the agreements stated in the MOU between the City and COCC.

## Safety/Security Role

Campus Safety Department members should fulfill the following safety and security roles and services to stakeholders:

- Primary Safety and Security Authority
- Assist Title IX Officer
- Clery Compliance and Annual Reporting
- Crime Prevention and Deterrence
- De-Escalation and Mental Health Crisis Intervention
- Threat Assessment and Prevention Team Management
- Physical Security of Campus Buildings
- Safety Inspections of Campus Buildings and Grounds
- Security Patrol of Campus Properties and Buildings
- First Aid, Medical/Injury Response
- Fire Prevention, Safety and Incident Response
- Inclement Weather Safety and Incident Response
- Law Enforcement/Fire Rescue Agency Liaison
- Campus Parking and Traffic Compliance
- Campus Motor Vehicle Accident Response and Reporting
- Campus Incident Response and Reporting
- Campus Policy Compliance
- Campus Assists (unlocks, locks, alarms, directions, jump starts, safety escorts)
- Victim and Witness Assistance/Referrals
- Emergency Preparedness/Management Coordination
- Life Safety Systems Management/Coordination
- Access Control Systems Management/Coordination
- Environmental Health/Safety Management Coordination
- Video Surveillance Security Systems Management
- Major Campus Event Safety and Security
- Campus CERT Program Coordinators
- Missing Persons/Items

## Training Role

Campus Safety Department members should fulfill and/or participate in the following training roles to provide training for stakeholders:

- Emergency Management/Preparedness Training
- Campus Safety/Security Training
- Crime Prevention Training
- Terrorism Awareness Training
- Active Shooter Training (i.e., "Run, Hide, Fight" & "Stop the Bleed")
- Campus CERT Program Training
- Access Control System Training
- Life Safety Systems Training
- Video Surveillance Security System Training
- Sexual Assault Defense Training Campus Community Outreach
- Fire and Evacuation Drills
- Standard Response Protocol Training and Drills

## REMOTE CAMPUS LOCATIONS

In addition to the main Bend campus, COCC has 3 additional campus locations in Central Oregon: Redmond, Prineville and Madras.

Stakeholders advised that in years past at the remote campuses, when CSD was fully staffed and robust on day and evening shifts, there was a security presence providing a campus safety role and performing tasks like door unlocks and parking management. Most recently, campus safety has had an inconsistent presence because of staffing shortages. Most requests for CSD assistance have been in the evening to help staff feel safe, including providing escorts to vehicles for students and faculty/staff.

Stakeholders advised that currently, expectations of CSD have been consistently low based upon a low level of service delivery, due to limited staffing and vacant positions.



Stakeholders advised that the role of campus safety at remote campuses is misunderstood. The needs of the remote campuses are different than those of the main Bend campus. The local police departments are the primary first line of support in the event of an emergency and CSD is more of a secondary service provider to the campus. On urgent matters, staff either addresses the issue or calls local police, with whom staff have an excellent relationship, notifying campus safety after the fact, in most cases.

Some of the criminal activity challenges at the Redmond campus involve thefts and trespassers. The remote campus staff have a good relationship with their local police department, who will respond to calls for service at the campus in a timely manner.

Stakeholders would like to see CSD at the campuses more frequently to interact with students, staff and faculty, engaging in relationship building. There is an additional need for the remote campuses to receive training in emergencies and critical incidents such as "active shooter", de-escalation and personal self-defense for staff and students.

The remote campuses value the Environmental Safety and Health functions provided by CSD and rely on CSD for scheduled facility inspections including fire suppression systems.

CSD has not been providing the remote campus community nighttime escorts to the parking lot due to campus safety staffing shortages. Door unlocks have been performed by staff. The remote campuses do not utilize security cameras.

Additionally, the remote campus staff would like to see COCC utilize "trespass letters of consent" with local police in lieu of private patrols. That way, local police could handle trespassing issues on COCC property without staff or CSD on-scene involvement.

## Recommendations

CSD officers on day and swing shift should each visit remote campuses at least once per week.

CSD should endeavor to build relationships with staff, faculty and students at the remote campuses.

CSD should continue performing Environmental Health and Safety functions at the remote campuses.

CSD should pursue engaging in a "trespass letter of consent" with local law enforcement in each remote campus jurisdiction to address trespassing after hours on COCC remote campus property. Such a trespass letter will allow local law enforcement to deal with issues like trespass, by making arrests for trespass outside of business hours when a COCC staff member or "person in charge" is not present.

CSD should provide or facilitate training to stakeholders at remote campuses including but not limited to the following areas: "active shooter", personal self-defense, emergency response and de-escalation, or other topics as necessary.

## TRAINING RECOMMENDATIONS

A variety of training is recommended specific to members of CSD.

### **On-boarding:**

Each new member should participate in COCC Human Resource on-boarding training. Additionally, each new CSD member should participate in on-boarding training specific to CSD, including a Field Training and Evaluation Program (FTEP) to be developed by the Campus Safety Director and staff.

### **General training:**

CSD members should successfully participate in the following training:

- DPSST requirements
- First Aid/CPR/AED
- Blood borne pathogen
- Defensive Tactics

- Pepper spray (If allowed by policy)
- Fire suppression
- CSD specific policy and procedure
- Crisis Intervention/De-escalation Training
- Active shooter – e.g., “Run, Hide, Fight”
- Trespass/exclusions
- Civil, criminal and personal liability related to private person arrest
- General civil liability

#### **Continued training:**

All CSD members should successfully complete 40 hours of annual “in-service training” (IST). Such training should focus on a variety of topics including but not limited to: policy and procedure changes, legal updates, emergency management updates, crisis intervention updates, leadership training, re-certification of first-aid/CPR/AED training, defensive tactics, pepper spray, personal protective equipment (PPE), and blood borne pathogen training.

IST could be accomplished by bringing the CSD team together for training 4 hours each month for 10 months or by bringing the CSD team together for training one week annually.

Consider sharing of training resources with Bend PD as outlined in the COCC/City of Bend MOU.

Consider engaging local law enforcement agencies in jurisdictions of remote campuses for sharing of training resources similar to what is outlined in the COCC/Bend MOU.

## **POLICIES & PROCEDURES**

The current COCC Campus Safety “General Operations Manual” provided as part of this review is a comprehensive manual made up of 70+ policies and procedures about day to day operations and duties of campus safety

personnel. The manual does not appear to have been updated or revised for several years.

While the "general orders" are laden with strong military or law enforcement oriented language, many of the "general orders" do provide guidance and explain policy and procedure for various duties, responsibilities and functions of campus safety officers.

Previously, the Campus Safety Department issued a handbook about traffic and parking titled "Traffic/Parking Regulations and Abridged Policies 2018-2019", presumably for distribution to the COCC community. The handbook does not appear to have been updated beyond its published date.

## Recommendations

The "General Operations Manual" must be reviewed and updated for language, content, statutory compliance, COCC policy compliance and compliance with the COCC/Bend MOU.

The "Traffic/Parking Regulations and Abridged Policies 2018-2019" handbook must be reviewed and updated for language and content.

The Campus Safety Director should empanel and lead a "policy and procedure working group" to include but not be limited to stakeholders such as a campus safety officer, a campus safety advisory council member, a COCC human resources representative, and a COCC risk management representative. The working group should add/rescind policy as necessary, adjust language, revise and update the "general orders" to reflect statutory changes, and best practices, while ensuring coordination and compliance with existing COCC policy and compliance with the COCC/Bend MOU. Final drafts should be reviewed by COCC legal counsel before issuance.

## CRIME/CALLS FOR SERVICE DATA

As part of this review, the Bend Police Department provided statistics on crimes, offenses and calls for service received by Bend PD at the COCC main campus for calendar years 2019 and 2020.

Relatively few police calls for service were generated in connection with the COCC main campus.

In the 2-year period of calendar years 2019 and 2020, a total of 357 incidents at COCC were reported to Bend PD. Of those 357 incidents, 22 incidents originated as 911 calls; 145 incidents originated as non-emergency calls and 190 incidents originated as officer initiated calls.

Consequently, the main campus had few reported crimes in that 2-year period. For instance, the following are numbers of some of the incidents reported: Assault: 4; Burglary 3; Criminal Mischief: 11; Domestic Disturbance: 2; Harassment: 9; Sex Crime: 5; Trespass: 4; Suicidal Subject: 2; Theft: 25; Weapon Offense: 1.

Internal data collected by COCC Campus Safety is reported in a pdf document titled "All Incident Report" and includes all incidents or activity by campus safety officers. Formatting is difficult to navigate and does not appear to be searchable.

Remote campus leadership indicated few crimes or offenses occurred on reported campuses, most involving trespass.

COVID-19 restrictions during 2020 may have impacted the number of reported incidents.

## Recommendations

Campus Safety staff should obtain and analyze quarterly statistics on calls for service from local police departments serving the main and remote COCC campuses.

Campus Safety staff should collect statistical data on all incidents and calls for service for campus safety officers. The data should be for all dispatched and self-initiated calls for service and activities. Data should be contained in a searchable database or computer aided dispatch system.

Calls for service data should be posted and updated accordingly on the COCC/Campus Safety website.

## LAW ENFORCEMENT/PUBLIC SAFETY CAPABILITIES

In light of recent resource impacts to local law enforcement agencies, some stakeholders expressed concern about the ability of local law enforcement to respond rapidly to COCC campuses in the event of a critical incident such as an "active shooter".

The main campus is served by the Bend Police Department and the Redmond campus is served by the Redmond Police Department; both are within Deschutes County. The Prineville campus is served by the Prineville Police Department and is within Crook County. The Madras campus is served by the Madras Police Department and is within Jefferson County.

Each of the city police departments serving COCC campuses are full-service agencies able to rapidly respond to any emergency or critical incident. Each of those city police departments is backed-up by their respective county sheriff's office.

All Central Oregon law enforcement agencies are members of the Central Oregon Emergency Response Team (CERT), except for the Deschutes County Sheriff's Office, which has its own SWAT team. CERT and the Deschutes County Sheriff team would be available to respond to respective COCC campuses as necessary.

Additionally, the Oregon State Police would respond to any of the COCC campuses in the event of a critical incident requiring their services.

The Federal Bureau of Investigation (FBI) also has a variety of services available to assist local law enforcement with any critical incident on a

COCC campus, such as threat assessment, investigative work, hostage negotiations and tactical teams, should the need arise.

The COCC/Bend MOU sets out Bend PD's commitment to COCC on providing necessary law enforcement services.

## Recommendations

It is imperative for the Campus Safety Director to conduct frequent outreach with chiefs and sheriffs of law enforcement agencies within the jurisdictions serving COCC Campuses, and federal law enforcement partners, to establish and maintain cooperative and collegial relationships before an incident occurs. Emergency contact information and protocols should also be exchanged.

The Campus Safety Department should endeavor to be part of information exchange meetings with area law enforcement agencies, and host or participate in training with those agencies in areas of common interest.

Building relationships, exchanging information and meeting regularly with heads of area fire and emergency medical service providers is also crucial.

The Campus Safety Director should ensure that the commitments outlined in the COCC/Bend MOU are being met.

## CAMPUS SAFETY DEPARTMENT REPORTING AND ADMINISTRATIVE INQUIRIES

While CSD is not a law enforcement agency, it does have an obligation to report on and document certain activities, whether it be a statutory requirement, to address liability/risk management concerns, situational awareness or as a good business practice. These activities may include the actions taken, observations made, services or aid rendered, and assistance provided. Additionally, the college must comply with the reporting

requirements of Title IX, the Violence Against Women Act (VAWA) and the Clery Act.

Campus Safety Officers are not authorized under statute to conduct criminal investigations as they are not law enforcement officers. However, there may be a need for Campus Safety Officers to conduct *administrative inquiries* regarding COCC policy, student conduct, etc. Documentation of CSD activities can be accomplished using the current campus safety reporting system, capturing necessary information and data on an incident report. Any reporting system in place should be simple to use and operate, while content should be searchable and retrievable.

The Memorandum of Understanding (MOU) dated May 22, 2017 between the City of Bend/Bend Police Department and COCC sets out clear guidelines about roles and responsibilities of Campus Safety and Bend PD regarding sharing of information, response to reported crimes, major incident response and reporting.

Calls for service on COCC properties involving local law enforcement should be tracked by campus safety staff for statistical analysis and reporting.

## Recommendations

The Campus Safety Director should ensure that the Campus Safety Department is in compliance with the MOU between COCC and the City of Bend/Bend PD.

The Campus Safety Director should review the current reporting system and make upgrades and adjustments as necessary.

The Campus Safety Director should identify a member of the campus safety team to be responsible for coordination of Campus Safety Department reporting requirements on Title IX, VAWA and the Clery Act.

The Campus Safety Director should ensure that reporting of incidents is properly tracked, with data produced for statistical analysis.



## COMPLAINTS AGAINST CSD MEMBERS

Transparency is paramount to the Campus Safety Department achieving and maintaining trust and positive relations with COCC stakeholders. Members of the COCC community must have a process available to them to file a complaint about allegations of misconduct or inappropriate behavior involving a Campus Safety Department member. COCC community members should be able to make a complaint about a campus safety department member online on the COCC website, at the CSD office, at any COCC remote campus or at the COCC HR office.

### Recommendations

The Campus Safety Director should partner with the Human Resources Director to develop a complaint process including intake and evaluation and develop an administrative investigative process that includes communication with the complainant about any resolution to complaints.

### WEBSITE

The Campus Safety Department has a robust presence on the COCC website however, the campus safety tab is a bit difficult to find. Any website information should be easily accessible and updated with the latest information. The Campus Safety Department should have a stand-alone access tab on the website's primary page.

### Recommendations

The Campus Safety Department should work with COCC IT to position the Campus Safety web access as a stand-alone tab on the primary page of the COCC website.

The Campus Safety Director should identify a staff member to work with the COCC Public Information Officer keep the Campus Safety website and social media content updated, accurate and relevant.

## **EMERGENCY PREPAREDNESS & ENVIRONMENTAL HEALTH & SAFETY**

Another primary function of the Campus Safety Department includes Emergency Preparedness (EP) and Environmental Health and Safety (EHS) work.

Currently, because of staffing shortages, little is done in terms of Emergency Preparedness. Historically, most of the emergency preparedness work has been left to the Campus Safety Department. The work is broad, complex and forever changing. The college would be served well by assigning Emergency Management and Preparedness as a responsibility of the Campus Safety Director. In time, dependent upon need and workload, it may be beneficial to create and hire a coordinator position specific to Emergency Management and Preparedness, with that position reporting to the Campus Safety Director.

An "Emergency Preparedness Assessment" was published in 2016 by an outside consultant, however there is little documentation demonstrating whether implementation of the recommendations in that report were made.

Emergency Preparedness plans should be updated and include broad topics such as general safety, wildfire response, weather events, earthquake and critical incidents, i.e., active shooter. Training on these topics should be provided to Campus Safety staff for their awareness and expertise development, and so Campus Safety staff can deliver training to the COCC community.

The Campus Safety Department should be responsible for providing and/or facilitating training in these topic areas to college faculty, staff and students. Training can be accomplished by a variety of methods including virtual training, in-person lecture/discussion and tabletop exercises.

Environmental Health and Safety (EHS) is a critical function currently performed by the existing Senior Campus Safety Officer. EHS responsibilities should remain within the domain of Campus Safety, with Campus Safety staff responsible for fulfilling that critical role.

## Recommendations

The Campus Safety Director should:

Be assigned responsibility for Emergency Management and Preparedness.

Ensure the COCC Emergency Management and Preparedness plans are updated.

Create and deliver Emergency Management and Preparedness training to faculty, staff and students.

Ensure that the Environmental Health and Safety responsibilities remain within the domain of the Campus Safety Department and assign such duties to the Senior Campus Safety Officer.

Consider creating an Emergency Management and Preparedness Coordinator position, embedded within the Campus Safety Department, reporting to the Campus Safety Director. The CSD Director should work with the Human Resources Department to determine if this should be a full-time or half-time position.

## CAMPUS SAFETY ADVISORY COUNCIL

To further shift the culture of the Campus Safety Department to engage and serve stakeholders transparently, it would be beneficial for the Campus Safety Director to create a Campus Safety Advisory Council comprised of representatives from the following disciplines: faculty, staff (including representation from remote campuses), residence hall, students and local law enforcement. Council members could be nominated by COCC leadership and serve a defined term. This Council could meet as often as

necessary (monthly, bi-monthly, quarterly, etc.) to advise the Director on topics such as engagement with faculty, staff and students, and policy, procedure and training.

## Recommendations

The Campus Safety Director should create a Campus Safety Advisory Council comprised of stakeholders from the faculty, staff (including representation from remote campuses), students, residence hall, labor and local law enforcement community to advise the Director on critical issues.

## PROFESSIONAL AFFILIATIONS – ACCREDITATION

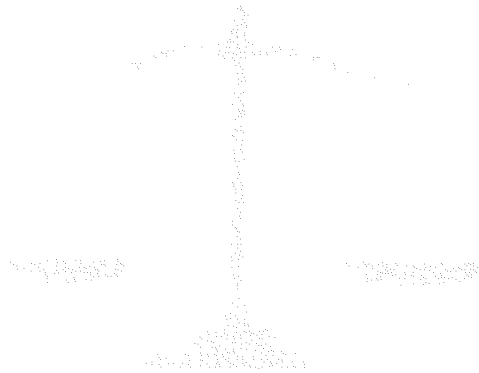
Professional organizations within the campus safety discipline can provide great benefit to COCC's Campus Safety Department by way of professionalization through training, accreditation, policy and procedure, and development of professional relationships. Several campus safety organizations exist in the US such as: International Association of Campus Law Enforcement Administrators; National Association of Campus Safety Administrators, Western Association of Campus Law Enforcement Administrators, Campus Safety, Health and Environmental Management Association, and the Clery Center. Additional resources are available through the International Association of Threat Assessment Professionals, the Central Oregon Safe School Alliance and the Governor's Task Force on School Safety.

Convening a quarterly/semi-annual meeting or creating a listserv of Oregon campus safety departments/directors within Oregon's higher education system would be beneficial so that leadership and staff can exchange ideas and discuss areas of mutual concern.

## Recommendations

The Campus Safety Director, on behalf of the department should seek membership in professional organizations that would assist in the continued development, professionalism and training of the Campus Safety Department.

The Campus Safety Director should explore convening a quarterly/semi-annual meeting or creating a listserv of Oregon campus safety departments/directors within Oregon's higher education system to exchange ideas and discuss areas of mutual concern.



## STAKEHOLDERS AND CONTRIBUTORS

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Sara De La Torre, President of COCC Classified Association

Dave Dona, COCC Chief Financial Officer

Roger Thorsvold, COCC Campus Safety Officer

Jenn Kovitz, COCC Director of Marketing and Public Relations

Jeremy Green, COCC Director of Redmond and Madras Campuses

Alan Unger, COCC Vice-Chair, Board of Directors

Susie Kristensen, COCC Director of Prineville Campus

Mindy Williams, COCC Humanities Faculty Member, President Faculty Forum

Zak Boone, COCC Chief Advancement Officer, Executive Director COCC Foundation

Betsy Julian, COCC Vice President of Instruction

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Laura Craska-Cooper, COCC Board Member

Erica Skatvold, COCC Chair, Board of Directors

Mike Krantz, Bend Chief of Police

Jim Porter, Retired Bend Chief of Police

Derrick Foxworth, Director of Public Safety, Portland Community College

Sara Westbrook, Director of Campus Safety, University of Portland

John Hummel, Deschutes County District Attorney



## REFERENCES

Dozens of documents, reports, media articles, memoranda, policy and the like were reviewed as part of this assessment. Some of those are highlighted here:

- COCC Campus Public Safety Department & Emergency Preparedness Assessment by John Ojeisekhoba December 2016
- COCC Traffic/Parking Regulations and Abridged Policies 2018-2019
- COCC Campus Safety by Diana Glenn, Instructional Dean Emeritus August 2015
- Memorandum to Dr. Shirley Metcalf from Professor Kathleen McCabe regarding Campus Public Safety work Group Recommendations dated March 19, 2019
- Memorandum to Dr. Laurie Chesley from Karen Vickers and Beth Plass regarding CPS Investigation Findings
- Oregon Senate Bill 576 – “Kaylee’s Law”
- Memorandum of Understanding between Central Oregon Community College and the City of Bend dated May 22, 2017
- Covid-19 Related Temporary Suspension of Intergovernmental Agreement Between Central Oregon Community College and the City of Bend for College Resource Officer Services.
- COCC Campus Safety Staff Job Descriptions for Director, Campus Safety Staff Senior, Campus Safety Staff (campus safety officer), Campus Safety Services Coordinator
- General Operations Manual, Campus Public Safety, Central Oregon Community College
- COCC Human Resources Policies
- COCC Campus Safety Budget Information
- Crime, Offense and Calls for Service statistical data provided by both the Bend Police Department and COCC staff.