



SUFFOLK
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SUFFOLK UNIVERSITY

PUBLIC SAFETY MANAGEMENT STUDY (PSMS™)

EXECUTIVE SUMMARY

DECEMBER 2018

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INTRODUCTION AND PROJECT SCOPE

Margolis Healy and Associates, LLC (Margolis Healy or MHA) was retained to assess campus security with a particular emphasis on the operations and orientation of the Suffolk University Police and Security Department (SUPD). Additionally, to provide our professional opinion regarding the appropriateness of ongoing conversations about the possibility of providing lethal force tools to selected, trained, and vetted members of the department. To this end, we examined the University's security environment, and the strategies for maintaining a reasonably safe campus environment to inform our opinions in this area.

METHODOLOGY

Margolis Healy and Associates, LLC, conducted this assessment by becoming familiar with the University's culture, context, and physical environment, along with the unique safety and security challenges facing the University. We also examined the University Police and Security Department's operational strategy and its alignment with the University mission, crime prevention, community policing and community engagement, external collaborations to support this mission, and capacity to meet strategic and operational goals and community expectations.

As part of our assessment, during the week of April 23, 2018, Margolis Healy CEO Steven J. Healy facilitated campus forums to discuss perceptions and expectations of campus safety, specifically to understand the campus community's sense of security and expectations of its officers in terms of capability and capacity.

We also conducted an analysis of how Suffolk University's current state of physical security compares to best practices in higher education and with its peer institutions. Our assessment of these areas should provide a reasonable foundation from which to make key decisions ranging from its campus safety model, department orientation and strategy, the use of security systems and technology, crime prevention through environmental design, resource allocation, and overall safety and security policies and procedures.

This report provides observations and recommendations to provide an objective assessment of the current state of safety and security operations on campus, including the physical security program and other related campus security practices and protocols. This report also provides an understanding of the orientation and functional success of the University's safety and security initiatives and opportunities for improvement.

MHA Manager of Organizational Assessment Services Robert Evans led the assessment team, and the following MHA team members provided additional support: Manager of Security and Emergency Management Services Fran Mozgai, Physical Security Specialist Justice Healy, and Margolis Healy Associate Johnny Whitehead. The team conducted its on-site work from May 1 to May 3, 2018. MHA team members also conducted additional research and several follow-up interviews following our visit to campus. For additional information regarding the Margolis Healy team that conducted this assessment, please refer to attachment 4.

During our visits, we conducted interviews with a wide range of constituents, including students, faculty, staff members, and members of the University’s administration, as well as external stakeholders. Our meetings included a mix of one-on-one, small group sessions, and campus forums. During the forums, attendees openly engaged with the facilitators and willingly shared their perspectives about the state of campus security, and their perceptions about safety and security at Suffolk University. During the site visit, we also conducted a “Visioning Session,” designed to solicit input from key administrators on pertinent safety and security issues.

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

GENERAL OBSERVATIONS AND MAJOR THEMES

Overall, we found the University is diligently working to ensure a reasonably safe campus environment given its location and nature of the campus. Faculty, staff, and students generally acknowledged that the campus feels “safe.” It is our professional opinion that the University’s Police and Security Department (SUPD) is a high-functioning department that is effectively meeting its fundamental role of maintaining a reasonably safe campus. The University has invested in building a well-trained and competent staff. SUPD has incorporated a community policing philosophy into its services, and developed and implemented the appropriate policies and procedures to support its campus safety mission. There are of course ways for the department to improve its efforts to prevent and respond to crime and engage with the campus community. However, we believe the department’s leadership team and its frontline providers have a solid foundation from which to evolve.

Given that we were retained, in part, to consider if arming SUPD police officers would significantly enhance security on campus, and how such a transition might affect campus culture, we address these questions in the specific observations section of this report.

During this review, we identified opportunities for the department to enhance its delivery of safety and security services to the Suffolk community. For example, several internal stakeholders identified a desire for more crime prevention and safety awareness programming and proactive engagement with the campus community. While the department currently offers a wide range of training and engagement opportunities, we believe there are opportunities for SUPD to implement a more robust and purposed strategy for informing the Suffolk community of their crime prevention and community engagement initiatives.

With respect to the University’s approach to physical security, we were generally impressed, and found that the current program meets the physical security practices at peer institutions. However, while the University has invested considerable resources in security technology and developed reasonable security practices, it has yet to transition these practices into a comprehensive written physical security strategy, supported by the appropriate policies and procedures.

During this assessment, we identified several major themes. Below, we provide a brief summary of these themes, and address them in detail in the specific observations section of this report.

MAJOR THEME 1: CRIME PREVENTION, COMMUNITY POLICING, AND COMMUNITY ENGAGEMENT

SUPD currently offers a wide range of crime prevention, community engagement, and community policing initiatives that include but are not limited to: RA “Behind Closed Doors” scenario training; Coffee with a Cop; Run, Hide, Fight; bicycle patrols; CPR training; and de-escalation training for staff. While key stakeholders described the department’s leadership team and crime prevention staff as professional, efficient, and responsive, the community desires more interaction with all members of the department. While continuing to work with internal stakeholders, such as Residential Life, Student Affairs, Athletics, and Facilities, the department should work to enhance community engagement and crime prevention opportunities that broaden the level of participation among all ranks of SUPD.

MAJOR THEME 2: BUILDING THE SUPD COMMUNITY PERSPECTIVE

It was obvious to us during our time on campus that the Suffolk community desires a closer connection to its Police Department. This is a challenge for many campus safety departments that go about their very important jobs relatively quietly and successfully, yet rely on non-events to tell the story about their effectiveness.

SUPD should work with the University’s communications department to highlight department members, who they are as individuals and as a group, as well as how the department contributes to the University’s mission and the many programs and initiatives it offers to enhance campus safety. This is especially important if the University continues to consider a possible transition to an armed department.

MAJOR THEME 3: PHYSICAL SECURITY APPROACH

In our professional opinion, the University should invest in formalizing the infrastructure of the physical security program, including developing and implementing policies for security cameras, access control systems, and emergency notifications. As noted beforehand, while the University is meeting or exceeding many contemporary standards in its physical security program, it does so by way of unwritten practices, which the University should codify in formal policies and procedures.

SPECIFIC OBSERVATIONS

PART I: PUBLIC SAFETY MANAGEMENT STUDY

Mission, Role, and Considerations for Tools to Accomplish This Mission

Campus safety departments exist along a spectrum between full-service police departments, similar to municipal police agencies, and those that function primarily as community caretakers, with a security role and an “observe and report” mission.

Suffolk University has taken intentional steps to determine if it should further consider providing lethal force tools to its sworn police officers. This is not unlike the path followed by the majority of the institutions of higher education (IHEs) in the Boston area that have elected to equip their sworn police officers with lethal force weapons. We note a 2016 “Boston Area Campus Safety Survey” that found that out of the 18 colleges and universities in the greater Boston area, two-thirds of these institutions have armed officers.

The Evolving Campus Security Landscape

One of the most important considerations regarding the appropriate equipment for campus safety officers is institutional and campus community expectations during response situations. Does the campus community expect the officers to primarily fulfill an “observe and report” role whereby they respond and contact local police for assistance, or are there expectations that officers are capable of responding to a wide range of incidents, including those that are potentially violent and may require the use of force to resolve a dangerous situation? The University has taken intentional steps to staff, train, and resource SUPD in a configuration that is more in line with a full-service police department, and is farther along the spectrum of campus safety models described above. SUPD officers are capable of responding to a wide range of calls for service and the organizational and supervisory structure mirrors many sworn/armed campus safety departments with whom we have worked. In fact, sworn members of SUPD have the legal authority to carry lethal force tools through the state’s special police officer “warrant” process. Given this authority, should the university choose to arm its sworn officers, this process could be completed in a relatively short period of time.

Many institutions have decided that having their own trained and appropriately equipped officers is one of the most reasonable measures to address the threat of a targeted violence situation. Of course, not all

campus safety departments have made the same decision and some have instead relied on a policy that requires them to summon local police in potentially violent situations. While we do acknowledge the large number of local, county, state, and federal law enforcement agencies in close proximity to the University that are capable of responding to a critical incident on campus, we also recognize that many of these same responders would have limited knowledge and familiarity with campus, which could result in significant delays in their response.

Given the research regarding the nature and duration of these types of incidents, institutions should assess whether to continue to rely on a local police response for targeted violence incidents on campus.

The Current State of Police-Community Relations

It was clear to us during our conversations with Suffolk community members that there are members who oppose providing officers with firearms. Given the myriad ways in which we solicited and received feedback, we can say with a degree of certainty that of those who participated in the campus forums and/or those who participated in our interviews, there were mixed feelings about the prospect of SUPD transitioning to an armed department. While we acknowledge that members of the Suffolk community have strong feelings on both sides of this issue, the perceptions about the negative impact that arming officers may have on campus safety, culture, and environment are greatly influenced by personal, familial, and community experiences with police.

Producing unbiased policing, including on college campuses, and maintaining productive relationships with the community, are particular challenges for law enforcement agencies of all types. As stated earlier, our campus forums identified areas of concern revolving around the question of arming sworn members of SUPD. It is our professional opinion that the ongoing national dialogue involving the law enforcement community's inappropriate use of deadly force during specific encounters highlights the importance of developing unbiased policing strategies that build trust and confidence between law enforcement and the communities they serve. Adding lethal force tools to SUPD may cause further strain among some members of the campus community if these unbiased policing strategies do not achieve their desired outcomes.

Clearly, there are differing opinions on the arming issue that fall on complete opposite ends of a spectrum. We believe it is critical for Suffolk University to acknowledge the experiences and opinions of

both groups, and, irrespective of the direction it decides to follow, implement measures that directly address the concerns of all members of the community, regardless of whether they support or oppose arming.

Recommendations

1. Continue the conversation regarding arming its sworn, trained, and appropriately vetted police officers. It is our professional opinion that this is a reasonable step given the Suffolk University security environment, campus expectations, and the evolving landscape of campus safety and security.
2. Continue to build on SUPD initiatives to produce unbiased policing among all members of the department. The University should be completely transparent about these efforts and openly publicize them to the community.
3. Develop a communication plan to familiarize the campus community with SUPD's campus safety role, mission, and strategy for meeting campus expectations.
4. Continue to leverage existing relationships with peer institutions in the greater Boston area, who have armed campus safety departments, to determine lessons learned from their arming implementation plans.

Crime Prevention, Community Policing, and Community Engagement

Observations

Crime prevention, safety awareness programming, and a community-based approach to campus policing should be vital components of a campus safety agency. The SUPD sergeant in charge of investigations is responsible for the department's crime prevention and community relations initiatives. The sergeant represents SUPD on the Law Enforcement Area Resource Network (LEARN). This group of campus and hospital public safety agencies meets monthly to share information and discuss neighborhood problems, such as homelessness and mental health challenges the area is currently experiencing. The sergeant attends monthly neighborhood meetings at the local Boston Police district and works with Boston Police personnel on neighborhood issues affecting the University community.

We were pleased to learn that SUPD has developed robust crime prevention and community engagement programs that include but are not limited to:

- Rape Aggression Defense (RAD)
- Active shooter response training
- Coffee with a Cop
- CSA training
- Study abroad safety talks
- Crime prevention seminars
- Campus escort program
- RA/RD “Behind Closed Doors” scenario training

While it is clear from our analysis that SUPD has taken steps to develop comprehensive crime prevention and community engagement programs, in our conversations with Suffolk community members many advised they would like to see more programming around personal safety, fire drills, de-escalation training for students and staff, and joint training between SUPD and Residential Life staff. While these same community members were pleased with the level of engagement from SUPD leadership, many recommended a greater level of participation in crime prevention and community engagement initiatives by all members of the department. In our work with clients across the country, we have found that while many campus safety departments have developed a wide range of community engagement initiatives, some have not developed appropriate communication strategies to inform their stakeholders about the availability of these programs to their campus communities. Working with internal stakeholders, SUPD leadership and crime prevention staff should review the department’s communication strategy to ensure all stakeholders are aware of the training opportunities currently being provided on campus.

We were also encouraged to learn that SUPD recently added another police officer to its crime prevention and community outreach program. While we recognize the significant efforts made by the department in this area, we believe there are opportunities to expand this programming by developing a comprehensive strategy that identifies specific crime prevention and community policing goals in support of the department’s campus safety mission.

Campus safety agencies are in a unique position to bridge gaps between law enforcement and communities of traditionally marginalized communities. Building and maintaining relationships with various campus groups (e.g., BLSA, LGBTQ, SALSA, Suffolk Law Muslim Student Association, to name only a few) adds instant value to the

campus safety enterprise as the department enhances its credibility and reputation, and members of the group openly communicate with campus safety officials. An opportunity exists to enhance SUPD's engagement with these marginalized groups by assigning staff to participate in group meetings and listening sessions, designed to build trust, faith, and confidence between SUPD and the broader campus community.

Recommendations

5. Use data from incident reports and community feedback to identify opportunities to create crime prevention and safety awareness programming.
6. Identify officers to serve as formal liaisons to affinity groups.
7. Continue to enhance and implement a comprehensive crime prevention and community policing strategy that includes personal safety, critical incident response and de-escalation, and prevention of violence training.
8. Continue with the practice of ensuring all members of the department receive annual training in best practices in community and problem-solving policing. Continue to utilize the President's Task Force on 21st Century Policing as a guide for training its members.¹
9. Continue to provide implicit bias training to all SUPD staff.
10. Enhance SUPD communication strategies designed to inform campus stakeholders of crime prevention and community engagement initiatives.

Collaboration with External Partners

Observations

SUPD leadership has exceptional working relationships with the local, state, and federal law enforcement agencies in the greater Boston area. Many of the leaders of these organizations have served previously in a law enforcement capacity with members of SUPD's leadership team and everyone we spoke with commented favorably on the professional manner in which SUPD conducts its day-to-day operations. While these same leaders described the area surrounding the University as "reasonably safe," they fully supported the University continuing its conversations with regards to providing lethal force tools to its police officers.

¹<https://ric-zai-inc.com/Publications/cops-p341-pub.pdf>

Our review of the University's 2017 Annual Security and Fire Safety Report confirmed that Suffolk community members have not been the targets of an overwhelming number of violent crimes, burglaries, larcenies, or assaults. In reviewing the crime data provided by Boston Police Department (BPD) for the 2015 to 2017 time period, for the geographic areas in close proximity to the University, we did note a number of simple assaults, aggravated assaults, drug crimes, residential burglaries, and larcenies. While these types of crimes are concerning for any neighborhood or community to experience, we do not find them excessive and out of the "norm" for large urban areas similar to the Boston area where the University is located.

On a daily basis, the Boston Regional Intelligence Center (BRIC) provides a law enforcement bulletin to SUPD that informs officers of recent criminal activity and crime trends impacting the greater Boston area. SUPD supervisors share this information during daily "roll call" meetings and use it to prioritize the department's patrol operations. SUPD leaders also attend a monthly meeting with the local Boston Police district to discuss areas of mutual concern with other law enforcement agencies in the area.

In our research, we noted that the BPD and SUPD have developed a signed Memorandum of Understanding (MOU) that provides the operational framework for this collaborative community policing initiative.

While we commend SUPD for the establishment of the MOU described above, we recommend that SUPD consider and develop additional MOUs with the Boston Police Department, Boston Fire Department, Massachusetts State Police or the Federal Bureau of Investigation. These MOUs will serve to establish the operational framework for the sharing of emergency response resources when responding to a critical incident at the University.

In an effort to enhance the University's ability to respond to a critical incident, we believe there is an opportunity for SUPD to augment their existing training and exercise program with local, state, and federal emergency first responders, with a focus on testing and evaluating its current emergency response plans, policies, and procedures.

Recommendations

11. Explore additional opportunities with local, state, and federal emergency first responders to define the operational framework for the sharing of resources during critical incidents.

12. Develop and implement an all-hazards focused training and exercise plan designed to test and evaluate existing emergency preparedness plans, policies, and procedures.
13. Continue to participate in information sharing with local, state, and federal partners.

Operational Strategy and Orientation

Observations

General Order ADM-02 (dated January 31, 2018) states that the department's mission is "To provide a safe and secure environment that enhances the educational mission of the University. We are committed to the protection of life and property, and the prevention and detection of crime through a partnership with the community. The Suffolk University Police and Security Department is committed to excellence in service through proactive initiatives and the highest quality of professionalism, and dedication."

We were pleased to learn that once a month, the chief, his management team, and the department's supervisors meet to discuss current patrol priorities and issues affecting the department and the University community. Every six months, the chief hosts a department-wide meeting to share his command guidance and to discuss any short- or long-term goals for the department.

Every Monday, the chief meets with representatives from Residential Life, the counseling department, and Student Affairs, along with the University's risk manager to discuss mutual areas of concern from the past week's activities on campus. The chief also participates in monthly meetings with similar stakeholders to review significant events that the University experienced over the previous month. The chief is also a member of the University's threat assessment team.

SUPD should work with its internal and external partners to develop a comprehensive strategic plan that will provide the framework for the department to achieve its mission on campus. Once developed, SUPD must orient all members to the strategic plan to ensure members fully understand their individual roles and responsibilities in working to achieve their collective campus safety mission.

Recommendations

14. Work with internal and external partners to develop an SUPD strategic plan.

15. Develop specific and measurable goals in the strategic plan, and build accountability measures into the department's performance management system.
16. Develop an annual review process to identify operational strengths and gaps in the department's strategic plan.

PART II: SAFETY AND SECURITY PROGRAM ASSESSMENT (SSPA)

Physical Security Approach

Observations

Our team's assessment consisted of multiple stakeholder interviews as well as physical inspections of a representative sampling of the University's academic, administrative, residential, dining, and multiuse spaces. Through our observations, we believe Suffolk is meeting or exceeding contemporary standards as well as meeting or exceeding physical security practices at peer institutions.

Overall, we believe that the University is making extensive use of electronic access control devices as well as security cameras. We also found Suffolk is meeting or exceeding a significant number of contemporary standards in its physical security program. We commend the University's physical security program and recommend it formalize its practices through policy development and implementation.

Our observations below are not indicative of an inadequate security program. Quite the contrary, we found the current state of the physical security program at Suffolk to be quite good. We suggest the University view these observations and recommendations as tools to strengthen an already effective program.

We observed that the implementation of security systems at Suffolk's facilities is quite good. We believe that overall the University has placed its cameras and electronic access control hardware in a sensible manner throughout campus. In fact, a majority of the University's facilities implement secure access practices, where constituents must utilize a single ingress point, swipe their campus card through a magnetic stripe reader, and have their identity verified by a security officer. Such measures are widely considered a best practice.

We believe that the residential security program at Suffolk in particular is exemplary. Residence halls utilize secure access with four layers of security between the exterior and individual residential units. The residential program also makes extensive use of door position switches and has sound visitor management policies implemented.

We believe that Suffolk should develop an overarching structure specifying the minimum physical security measures at each facility depending upon its nature and function. Such standards will facilitate the consistent use of security systems on campus.

One method used to develop such a standard is to tier buildings by function and potential threat level. This allows the University to group existing facilities and new construction into established baseline security standards. While the tier system establishes minimum standards, the University should remain open to implementing stronger security measures as may be appropriate for a specific program within a particular location.

Once the University establishes its tiers, it can add additional security measures and hardware as the campus and its environment evolves.

While we recognize the existence of an unwritten SUPD policy regarding the use of security cameras, we believe they would benefit from a written and more comprehensive policy.

SUMMARY OF CAMPUS FORUM FEEDBACK

At Suffolk University's request, Margolis Healy facilitated a number of campus forums to solicit campus feedback about the current state of campus safety and security. Participants openly shared several important points about campus security during the forums and engaged in respectful dialogue about opposing views.

Several major themes, covering a wide range of issues, emerged over the two days of forums. Below, we summarize these themes in the priority in which campus community members raised them:

- **Most campus members expressed feeling extremely or relatively safe.**

Most forum participants expressed feeling safe on campus, with many citing the University police presence as a contributing factor to their sense of security. Where participants shared a sense of vulnerability, they attributed it to the apparent increase in targeted violence incidents across the country, concerns about dealing with disruptive individuals on campus, and the inconsistent application of security procedures on campus. We address these issues in detail in other sections of the report.

- **Campus members expressed a desire for more proactive and robust crime prevention and safety awareness programming.**

Aside from generally feeling safe on and around campus, participants most often shared their desire for more robust safety awareness programming. At every forum, campus members cited their lack of understanding about what to do during an emergency, how to de-escalate potentially volatile situations, and the need for closer relationships with members of the University Police Department. We recommend several initiatives to address these concerns.

- **Some participants demonstrated a lack of awareness about SUPD's organization, their capacity, and the department's mission and orientation.**

Several participants shared that they have no real sense of what the SUPD is, who the members are, the differences between sworn and non-sworn members, SUPD training and background, and what the department does during an emergency situation. This perspective supports our opinion that the University should develop an intentional strategy for building an awareness as to the capabilities of and resources provided by the University Police Department.

- **Many participants highlighted inconsistent access control practices and interactions with students.** Many participants expressed concern about inconsistent security practices, including confusing access control procedures and differing staffing levels from building to building. This feedback likely aligns with the perspective about the lack of awareness about SUPD and security procedures. To address this concern, the University should take measures to ensure consistent application of security procedures, especially concerning access control practices.
- **Participants expressed a desire for more information about why the University is considering arming, including a robust process for hearing all the various perspectives about how arming may affect all members of the campus community, including traditionally marginalized groups.**

As expected, we received opposing opinions regarding the prospect of the University transitioning to an armed police department. On one hand, several participants supported arming and stated their desire that trained, sworn members of the SUPD should be equipped with firearms to effectively respond to a violent incident. On the other, many attendees expressed their vehement opposition to SUPD members having access to firearms. Campus members who opposed arming cited the national context of police-community relations, highlighting incidents of police shootings of unarmed black men. These participants expressed their concern about how arming would drastically change the campus climate and create a less inviting environment for students of color and other marginalized communities, such as immigrant students and members of the LGBTQI communities. Attendees who voiced their support for arming cited the current practice of unarmed police officers as unfair to the officers who are responsible for responding to potentially violent situations and blind to the reality of how violent interactions unfold.

Obviously, the issue of providing firearms to SUPD officers generates very divergent viewpoints. As the University further considers this issue, it is imperative to establish a process where all campus members have an equal opportunity to share their opinions and to consider the varying perspectives within the full context of today's environment. We address this issue elsewhere in this report.

SECTION VI – FIRM QUALIFICATIONS

Margolis Healy is a professional services firm specializing in campus safety, security, and regulatory compliance for higher education and K-12. We provide our clients with specialized services that include physical security assessments; Title IX and *Clery Act* assessments and training; emergency management risk and hazard assessments; emergency preparedness and crisis response systems and exercises; implementation of lethal and less-than-lethal force options; litigation consultation and expert witness services; and special investigations.

Dr. Gary J. Margolis and Mr. Steven J. Healy founded Margolis Healy in 2008. With twenty years each of providing consulting services to clients in the education, public and private sectors, their combined experience quickly earned Margolis Healy recognition as one of the leading professional services firms for safety and security needs in North America. In 2013, the U.S. Department of Justice Bureau of Justice Assistance awarded the firm funding authorized by Congress to establish and operate The National Center for Campus Public Safety.

The Margolis Healy team has managed or been intimately involved with numerous high profile cases. These include reviews, assessments and investigations at Penn State, The Citadel, University of Pennsylvania, and Dartmouth College, to name a few, and large-scale disasters such as the 9/11 tragedy's impact on schools in NYC. Shortly after the tragic mass-shooting incident at Virginia Tech, the U.S. Department of Education asked Margolis Healy to participate in the development of the first-ever emergency management guide for higher education. The resulting Action Guide for Emergency Management at Institutions of Higher Education is considered an essential playbook for campuses. Mr. Healy and Dr. Margolis are 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.



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