POLICY DEVELOPMENT AND IMPLEMENTATION OF LEGISLATION PERMITTING THE CARRYING OF CONCEALED HANDGUNS ON COLLEGE AND UNIVERSITY CAMPUSES: PROMISING PRACTICES

Findings From a Forum of Campus Public Safety Leaders

Coordinated by the

NATIONAL CENTER FOR CAMPUS PUBLIC SAFETY

June 2017

**Policy Development and Implementation of Legislation
Permitting the Carrying of Concealed Handguns
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Findings From a Forum of Campus Public Safety Leaders

A Report for the

BUREAU OF JUSTICE ASSISTANCE, U.S. DEPARTMENT OF JUSTICE

and the

NATIONAL CENTER FOR CAMPUS PUBLIC SAFETY

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TABLE OF CONTENTS

EXECUTIVE SUMMARY

As a result of expanded state legislation across the United States permitting the carrying of concealed handguns on college and university campuses, many institutions have been required to develop concealed carry policies that meet the mandates of state laws. It is imperative that while ensuring a safe environment on campus, colleges not inhibit the academic freedom of the institution by placing real or perceived restrictions on speech in the classroom or permitting real or perceived intimidation of the campus community as a result of the language of the policy. Developing policies has been challenging not only due to the variability in the provisions of state laws but also because the laws have elicited emotional responses from campus community members who both support and oppose the laws.

Because of the complexity of issues, campus public safety officials requested assistance from the National Center for Campus Public Safety[1] (NCCPS) to help identify promising practices and considerations for policy development and implementation. Based on these requests and the growing national movement toward campus carry legislation, the NCCPS, funded by the Bureau of Justice Assistance (BJA), convened a forum of campus public safety executives, federal officials, and subject-matter experts on the issue on November 15–16, 2016, at Collin College (www.collin.edu). The intent was to identify and explain critical components and considerations in developing and implementing a policy for carrying concealed handguns on campus. Developing a nationwide "model policy" was not feasible because of the differences in state legislation that authorized what has become known as "campus carry" and due to the wide variability in the characteristics of campuses across the country.

The forum was convened "to identify critical items to consider during the development and implementation of policy and procedures reflecting current legislation regarding campus carry."[2] This report reflects the findings of the forum that provide informed guidance to institutions of higher education in the process of developing or anticipating the need to develop such a policy.

At the outset, participants emphasized the importance of understanding the context of this initiative from three core perspectives. First, the responsibility was to develop a policy for concealed carry on college and university campuses that was consistent with state law. Participants did not make a value judgment on whether this was a "good" or "bad" law and instead sought to develop an operational, enforceable, and value-neutral policy that was compliant with the law and consistent with the rights

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[1] Established in 2013, the NCCPS is a clearinghouse for information, research, training, promising practices, and emerging issues in campus public safety. The NCCPS's mission is to provide useful resources and information to support safer campus communities. The NCCPS, which is a project of Margolis Healy, connects all forms of campus public safety, professional associations, advocacy organizations, community leaders, and others to improve and expand services to those who are charged with providing a safe environment on the campuses of the nation's colleges and universities. See http://www.nccpsafety.org/.
[2] This goal was taken from the instructional material handed out to forum participants.

and privileges of individuals who possess concealed carry permits, including all members of the campus community.

Second, it was recognized that there is no "one size fits all" policy. The policy has to be designed to not only be consistent with state law but to also meet the unique needs of each campus environment. There are significant physical, functional, and cultural differences among campuses that must necessarily be considered in the development and implementation of a policy.

Third, while the burden of enforcing the policy will largely fall on campus public safety officials, the burden of developing the policy and implementation plan needs to be an institution-wide effort. Substantive input is needed from campus public safety, central administration, faculty, students, and staff.

Forum participants identified eight critical factors that should be considered in developing and implementing an overall campus carry policy. These factors are:

1. Policy
2. Legal
3. Education
4. Implementation
5. Training
6. Research and Evaluation
7. Communication
8. Culture/Climate

This report provides brief background research related to concealed carry, a discussion of the array of issues that must be addressed in preparing to develop the policy, and a detailed discussion of issues, processes, special considerations, and lessons learned associated with the eight critical factors. Direct and tangential resources are provided in footnotes to aid campuses in identifying critical issues for inclusion in the policy, developing approaches for integrating the policy with campus daily life, and addressing disagreements and controversy that may arise from the campus carry policy.

POLICY DEVELOPMENT AND IMPLEMENTATION OF LEGISLATION PERMITTING THE CARRYING OF CONCEALED HANDGUNS ON COLLEGE AND UNIVERSITY CAMPUSES: PROMISING PRACTICES

INTRODUCTION

There has been a movement in state legislatures across the country to pass laws relating to the carrying of handguns on one's person. One method is to permit citizens to carry handguns openly visible without a permit (known as "open carry"). Another approach is to permit citizens to carry concealed handguns through a permitting system (referred to as "concealed carry"). There are also states that allow the concealed carrying of a handgun without a permitting system.[3] In the wake of this legislation, proponents of concealed carry have raised concerns about limitations on the locations where firearms can be taken by citizens. These include government buildings, medical facilities, high-attendance public events, and schools, among others. One growing focus, in particular, has been the carrying of handguns on college and university campuses.

Some of the interest for concealed carry on campus is a result of a number of high-profile violent incidents on or near campuses.[4] Proponents[5] of concealed carry argue that persons with lawful concealed handguns could intervene in violent crimes, helping to prevent further victimization. Opponents[6] feel that the presence of handguns on campus can be an intimidating force and raises concerns of some faculty about intimidation in the classroom, concerns of campus public safety personnel about security during large-scale events on campus (e.g., sporting events, festivals, and concerts), and concerns of some members of campus communities who are ideologically opposed to having any type of firearm on campus for a variety of reasons.[7] (Interestingly, as one gauge of the issues, evidence from Tennessee's 51 public colleges and universities[8] found that less than 10 percent of roughly 27,000 eligible employees registered for campus carry.)[9]

The motivations for the concealed carry movement vary greatly and are largely of tangential concern for the purpose of this report.[10] Specifically, it is recognized that the legislation authorizing concealed carry on college campuses must be translated to

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[3] For more information about the lawful carrying of weapons and the Second Amendment, see http://www.jurist.org/feature/featured/concealed-and-open-carry-under-the-second-amendment/detail.php.
[4] As illustrations, see https://ucr.fbi.gov/nibrs/crime-in-schools-and-colleges and http://www.victimsofcrime.org/docs/ncvrw2013/2013ncvrw_stats_school.pdf.
[5] For example, see http://concealedcampus.org/.
[6] For example, see http://www.armedcampuses.org/.
[7] From the perspective of students, the pros and cons of concealed carry debate are simplified in these two statements, http://www.vsuspectator.com/2015/04/05/procon-guns-on-campus/.
[8] https://www.tn.gov/assets/entities/thec/attachments/2014-15_Factbook.pdf
[9] http://www.guns.com/2016/08/13/tennessee-universities-report-limited-campus-carry-participation/
[10] For more information on the growth of concealed carry laws in the United States, see http://crimeresearch.org/2016/07/new-study-14-5-million-concealed-handgun-permits-last-year-saw- largest-increase-ever-number-permits/.

policy that can manage the lawful carrying of weapons as specified by state statute while at the same time maintaining a safe and secure campus environment.

The issues and observations in this report are ideologically neutral. Rather, the intent of the report is to provide college and university decision makers with pragmatic considerations for how to develop and implement a concealed carry policy that meets the unique needs of each campus and is consistent with state law and constitutional guarantees.[11]

State Laws and "Campus Carry"

According to the National Conference of State Legislatures (NCSL):

> In 2013, at least 19 states introduced legislation to allow concealed carry on campus in some manner, and in the 2014 legislative session, at least 14 states introduced similar legislation. . . . [Furthermore] all 50 states allow citizens to carry concealed weapons if they meet certain state requirements. Tennessee passed a similar bill to Arkansas' in 2016, which also permits higher education faculty to carry handguns after notifying local law enforcement. In 2015, Texas became the most recent state to allow concealed carry weapons on college campuses, which will go into effect in August 2016. A 2016 bill in Georgia was on track for passage but was ultimately vetoed by the governor. In December 2016, Governor Kasich of Ohio signed into law SB 199 which lifts the ban on firearms on college campuses and leaves the decision to individual institutions.[12]

The NCSL goes on to note, "Recent court cases have also overturned some long-standing systemwide bans of concealed carry on state college and university campuses."[13] As a result, states are facing changes in law related to the carrying of handguns on college and university campuses.

These changes in law present challenges to campus law enforcement and public safety. The provisions of law vary significantly among states, as does the character of each institution. The geographic character of institutions, urban campuses, residential versus commuter campuses, enrollment size, types and size of on-campus public events, unique programs or security concerns, and many other factors will affect the design of the policy and how it is implemented, communicated, and enforced. The state laws differ on factors such as how exclusion zones may be delineated, provisions of concealed carry for employees versus students, and obligations of the institutions on

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[11] Most readers are familiar with the Second Amendment right to bear arms—for the legal history, see https://www.law.cornell.edu/wex/second_amendment. In addition, most states also have a provision in their constitution for the right to bear arms. For more information, see http://www2.law.ucla.edu/volokh/beararms/statecon.htm.
[12] http://www.ncsl.org/research/education/guns-on-campus-overview.aspx
[13] Ibid.

matters of safety and the security of handguns when the carrier goes into an exclusion zone (e.g., does the institution have to provide handgun lockers?).

Because of this variability, for this report, there is limited value in analyzing the characteristics of each state's legislation. However, there are important lessons to be learned from colleges and universities that have implemented a campus carry policy in states where this legislation has passed. Indeed, institutions that have implemented a campus carry policy in response to new state laws have identified critical issues and processes that can provide valuable guidance to campus law enforcement and public safety departments facing this challenge.

Campus carry is a highly charged emotional issue about which both advocates and opponents will be vocal and critical. Some institutions have reported that faculty members have threatened to leave the institution[14] if concealed carry is permitted, while some students say they will feel threatened and unsafe if there are people on campus carrying concealed handguns.[15] Conversely, advocates of concealed carry on campus argue that it is their constitutional right to carry weapons on campus under the Second Amendment and that it will help make the campus safer.[16] Regardless of these diverse voices, it is incumbent on the institution to develop a fair and comprehensive policy that is consistent with the state law authorizing concealed carry on campus and ensure that the policy is enforceable, reflecting the characteristics of the full campus environment.

Methodology of the Project

On behalf of the Bureau of Justice Assistance (BJA),[17] the National Center for Campus Public Safety (NCCPS)[18] convened a two-day critical issues in campus public safety forum of 27 college and university police and public safety executives as well as federal officials (see Appendix A) who have a range of experience in developing and implementing campus concealed carry policies in different states. Using a structured forum approach, the stated purpose was "to identify critical items to consider during the development and implementation of policy and procedures reflecting current legislation regarding campus carry."

Through a deductive, iterative, facilitator-led process, the participants identified issues and decision points in developing a campus carry policy that meets the requirements of state laws. As will be seen, this is a comprehensive process that identified a series of logical policy decisions to maximize safety to the campus community, ensure compliance with state law, and guarantee the constitutional rights and statutory privileges of citizens.

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[14] As an example, see https://www.thetrace.org/2016/04/majority-university-tennessee-faculty-oppose-campus-carry-private-poll/.
[15] As an example, see http://www.sacurrent.com/the-daily/archives/2016/02/23/survey-shows-most-utsa-students-feel-threatened-by-campus-carry.
[16] As an example, see http://www.sf2a.org/ and https://getinvolved.ncsu.edu/organization/sdsa.
[17] https://www.bja.gov/ProgramDetails.aspx?Program_ID=108
[18] http://www.nccpsafety.org/

The methodology was not designed to identify a model policy or best practices in policing a concealed carry campus. Rather, the methodology was designed to elicit information that would ultimately provide a road map for policy development, implementation, and enforcement.

Operational Definitions. During the forum, terms emerged that were unique to concealed carry policy development. While actual language may differ among state laws, the conceptual foundation was consistent. Further, some terms are defined that have specific meaning for this report as a writing convention for clarity. For clarity in the preparation of this report, the following terms are used:

- *Campus carry.* The carrying of a concealed handgun on a public college or university campus in compliance with authorizing state legislation.
- *Campus public safety.* A collective term used to refer to the organization and individuals with primary responsibility for ensuring safety and security, whether sworn or non-sworn, at an institution of higher education.
- *Concealed carry.* The practice of carrying a handgun in a concealed manner that is not visible to others after a person has been issued a permit as specified by state law.[19]
- *Constitutional carry/permitless carry.* State legislation that allows anyone who can legally possess a handgun to carry it concealed on or about their person without any requirement that the gun owner obtain a license or permit.[20]
- *Deconfliction.* A process of assessing and preventing conflicts in policy, law, or practice to avoid duplication and uncertainty and to reduce costs.
- *Education.* In this report, education refers to informing campus stakeholders (see definition below) about policy, rules, procedures, expectations, and the general environment of issues associated with the campus carry policy.
- *Exclusion zones.* Locations where policy forbids the carrying of concealed handguns, such as in medical facilities, counseling centers, and athletic events, among others.
- *Host jurisdiction/host community.* All institutions of higher education are geographically located within a city and/or county unit of government. Typically, that unit of government will have one or more law enforcement agencies that assist in policing the campus. The character of this relationship varies widely, yet whenever there is a significant public safety event on campus, invariably a local, county, and/or state law enforcement agency will join first responders. Host jurisdiction/community is a collective term referring to municipal, county, and state governments.
- *Institution.* A collective term used for referring to public higher education entities in a state, including community colleges, four-year colleges, and universities.

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[19] For more information on concealed carry, see http://usacarry.com/concealed_carry_permit_reciprocity_maps.html.
[20] As a guide, see https://www.nraila.org/gun-laws.

- *Open carry.* The practice of carrying a handgun in plain view. This is dependent on state law, with more latitude of openly carrying long guns versus handguns.[21]
- *Printing.* When the outline or shape of a concealed handgun can be seen in clothing with reasonable certainty that it is a handgun, then it is not considered to be "concealed."[22]
- *Stakeholders.* This includes direct members of the campus community, including students, faculty, staff, administrators, and trustees. On some campuses, stakeholders may include other individuals or groups who have regular direct involvement with the institution, including the host jurisdiction government, alumni, collateral research organizations/entities, and nonprofit entities to support the institutional mission. Visitors to the campus are not included as stakeholders.
- *Training.* For this report, training refers to the development of skills and the application of procedures for compliance with the campus carry policy.
- *Use-of-force situation.* There are different types of situations wherein a person who is lawfully carrying a concealed handgun may be justified in drawing and/or using the handgun. This includes self-defense, protecting the life of another, encountering an active shooter or encountering a violent crime in progress, or any combination of these or other life-threatening situations. For purposes of this report, these are collectively referred to as a use-of-force situation.

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[21] For a perspective and information on laws, see http://smartgunlaws.org/gun-laws/policy-areas/firearms-in-public-places/open-carrying/.
[22] For perspective and explanation, see http://concealednation.org/2014/07/10-common-concealed-carry-mistakes/.

LITERATURE AND RESEARCH ON CAMPUS CARRY

Criminal justice policies and practices should be made in the context of scientific evidence-based research.[23] Findings from this research can give clarity to an issue and provide guidance on policy development, implementation, and assessment. On the issue of campus carry, there appear to be two broad issues driving the trend: (1) the movement to reinforce Second Amendment rights into a broader spectrum of American life and (2) fear of crime, such as active shooters,[24] terrorism,[25] and sexual assaults,[26] on college campuses. Understanding these issues of concern, particularly in regard to vocal supporters or opponents, can aid in framing the structure for the campus carry policy.

On the issue of the Second Amendment, the social debate will continue; however, the legal debate will be resolved on the regulation of handguns. Following the case of *District of Columbia v. Heller,*[27] there has been an expansion of statutes permitting concealed carry that is now moving to college campuses.[28] Advocates of campus carry essentially will argue that this is an inherent part of their Second Amendment rights. Opponents argue that the right to bear arms is not absolute and that exceptions are permissible under the law, arguing that institutions in their entirety should be excluded. Regardless of the law, the social debate will continue and can be expected to emerge in the policy development process as well as broader debates on campus.

With respect to campus crime, one study examining the relationship between firearms crime and applications for concealed carry permits "demonstrated a significant relationship between firearms crime and subsequent applications and issuance of concealed carry handgun permits."[29] Advocates of campus carry argue that having more persons on campus who have had training and who have gone through the permit process can make a campus safer from violence. Opponents argue that the mere presence of more handguns on campus inherently increases the probability of firearms violence or accidents. While there is virtually no empirical evidence to support either of these positions, campus leaders and public safety officials must nonetheless be prepared to respond to these issues.

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[23] For a concise explanation of evidence-based practices in criminal justice, see http://canatx.org/CAN-Issue-Area-Groups/Reentry_Roundtable/CJP_EBP_FAQ.pdf.

[24] Virginia Tech, http://www.washingtonpost.com/wp-srv/metro/documents/vatechreport.pdf.

[25] Ohio State University, http://www.cnn.com/2016/11/29/us/ohio-state-university-attack/.

[26] University of Nevada-Reno, http://www.msnbc.com/msnbc/counterpoint-rape-survivor-argues-why-we-need-guns-campus.

[27] 128 S. Ct. 2783 (2008).

[28] Craven, L. (2009–2010). "Where Do We Go From Here? Handgun Regulation in a Post-Heller World." 18 *William & Mary Bill of Rights Journal*, 831.

[29] Carter, J., and M. Binder. (2016). "Firearm Violence and Effects on Concealed Gun Carrying: Large Debate and Small Effects." *Journal of Interpersonal Violence*, *28*, doi:10.1177/0886260516633608.

The American Association of State Colleges and Universities (AASCU) has taken a strong position against campus carry legislation, stating:

> Given the overriding goal to ensure that campuses are safe environments, the American Association of State Colleges and Universities (AASCU) maintains support for existing state laws that ban concealed weapons from public college campuses, or that provide for institutional and system autonomy with regard to concealed weapons policy. Further, the association discourages the passage of new state legislation that would overturn or weaken concealed weapons bans on campus.[30]

Conversely, the National Rifle Association (NRA) stated, "On campus carry, we have only begun to fight," further noting:

> We know that campus carry doesn't lead to problems, because permit holders have proven time and again—in state after state—to be even more law-abiding than the citizenry at large.[31]

It is important that the campus carry policy committee and public safety officials recognize these dichotomous, often emotional perspectives. They find themselves in the middle of these polar opposites and must be prepared to fairly and effectively navigate this chasm.[32]

In examining the research on campus carry, one study, following a legislative proposal to expand the carrying of a concealed handgun to colleges and religious institutions, found that almost 70 percent opposed the legislation, with 56 percent of those respondents "strongly opposed."[33] When asked specifically about campus carry, 72 percent were strongly opposed. Other research found that women, persons with higher education levels, self-described politically liberal persons, and residents of larger urban areas were factors that tended to lead to support for tighter gun control legislation.[34]

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[30] Harnisch, T. (November 2008). American Association of State Colleges and Universities (AASCU), *Concealed Weapons on State College Campuses: In Pursuit of Individual Liberty and Collective Security.* http://www.aascu.org/media/pm/pdf/pmdec08.pdf.

[31] https://www.nraila.org/articles/20150730/political-report-on-campus-carry-we-ve-only-begun-to-fight

[32] As an example, compare Debrabander, F. (2016). "How Guns Could Censor College Classrooms." *The Atlantic,* accessible at https://www.theatlantic.com/education/archive/2016/03/the-steep-cost-of-allowing- guns-in-the-college-classroom/472296/, to LaPorta, J. (2016). "In Defense of Self-Defense: Why Campus Carry Is a Good Idea." *The Crimson White,* accessible at http://www.cw.ua.edu/article/2016/02/in-defense-of-self-defense-why-campus-carry-is-a-good-idea.

[33] Bennett, K., J. Kraft, and D. Grubb. (2012). "University Faculty Attitudes Toward Guns on Campus." *Journal of Criminal Justice Education. 23*(3), 336–355. doi:10.1080/10511253.2011.590515. http://dx.doi.org/10.1080/10511253.2011.590515.

[34] Smith, T. W. (2002). "Public Opinion About Gun Policies." *The Future of Children. 12*(2), 155–163.

One interesting study found that there would likely be differential rates of students carrying a concealed handgun based on the building and class on campus.[35] Another study found some differential rates of students who said they would carry a concealed handgun based on their major.[36] Other research examined the issue of "how comfortable" students were with the prospect of having handguns on campus as a result of campus carry legislation. The researchers found that students in one sample were more than three times as likely to report that they were not at all comfortable with concealed handguns on campus. Conversely, this ratio was closer to 1:1 in relation to the question about comfort with handguns in the community. These patterns suggest that students regard the campus as a unique environment in terms of concealed handgun carrying.[37] The researchers noted that "the results of changing campus handgun carrying policies are not limited to crime and violence. The campus community's emotional and behavioral reactions are also relevant."[38] This is potentially an important point to consider for the implementation and educational aspects of the policy. While institutions will have an obligation to develop a campus carry policy based on state law, they need to understand the largely opposition environment in which that policy will be implemented and enforced.

Another study found that over 70 percent of respondents opposed the option of carrying concealed handguns on campus. In addition, the idea of more handguns on campus made the majority of students and faculty feel less safe, and allowing concealed weapons served to *decrease* the sense of campus safety.[39] Interestingly, this perception is the opposite of the argument of pro-campus carry supporters, who state that the presence of lawful concealed carry handguns would make the campus safer. Both groups are convinced their perspective is correct; however, there is no empirical evidence to support either. This information is important for implementation.

One researcher, who surveyed faculty at 15 midwestern universities, found very low support for campus carry (those faculty members who supported campus carry owned, on average, two or more firearms). A conclusion from the data analysis was:

> Faculty were overwhelmingly opposed to having concealed carry handguns on campuses. The academic doctrine that creates university atmospheres conducive to robust debate is antithetical to having firearms on campus.[40]

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[35] Bouffard, J., et al. (2012). "How Many More Guns?: Estimating the Effect of Allowing Licensed Concealed Handguns on a College Campus." *Journal of Interpersonal Violence. 27*(2), 316–343.

[36] Bouffard, J., M. Nobles, and W. Wells. (2012). "Differences Across Majors in the Desire to Obtain a License to Carry a Concealed Handgun on Campus: Implications for Criminal Justice Education." *Journal of Criminal Justice Education, 23*(3), 283–306.

[37] Cavanaugh, M., et al. (2012). "Student Attitudes Toward Concealed Handguns on Campus at Two Universities." *American Journal of Public Health, 102*(12), 2245–2247.

[38] Ibid., p. 2246.

[39] Patten, R., M. Thomas, and J. Wada. (2013). "Packing Heat: Attitudes Regarding Concealed Weapons on College Campuses." *American Journal of Criminal Justice, 38,* 551–569. doi:10.1007/s12103-012-9191-1.

[40] Thompson, A., et al. (2013). "Faculty Perceptions and Practices Regarding Carrying Concealed Handguns on University Campuses." *Journal of Community Health, 38*, 366–373. doi:10.1007/s10900-012-9626-0.

From a philosophical perspective, one ethicist observed that those who oppose concealed carry often implicitly suggest that those who seek to carry a weapon are the "problem." However, "simply because a person chooses to own a gun, that decision should not automatically criminalize them because ownership does not constitute that they will misuse a weapon."[41] Nonetheless, the emotional character of the campus carry debate often does not provide weight to this point.

Another ethicist observed:

> The Second Amendment is a very simple law when read, but has proven to be a much more complex issue when lines are drawn. What side an individual falls on can speak volumes for them without a literal word being spoken. When policy makers come together to try and do as they were elected to do, make laws, they are faced on a daily basis with ethical dilemmas. Rarely are things easy or black and white, most issues are a shade of grey. The Second Amendment is a shade of grey.[42]

The same is true with the privilege of campus carry. The challenge of the institutional policy is to remove shades of gray, in a functional sense, as it applies to the campus setting.

Despite the fact that empirical data show that many students and faculty are opposed to campus carry, this will not change state empowering laws.[43] Hence, part of the responsibility of the institution is to inform stakeholders of the policy and reassure them that the campus remains a safe environment. There is no empirical research that suggests that a campus is more or less safe with campus carry. Despite this, arguments will be made on both sides of the issue. The role of the institution is to implement a policy that is consistent with state law, enforce the policy, and provide information to the campus community in response to questions or issues that may emerge as a result of campus carry. In performing this role, the institution must be transparent, involve a diverse array of entities from the campus community, and communicate throughout the process, not just provide information after the fact.

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[41] Baker, D. (2009). "Collective Criminalization and the Constitutional Right to Endanger Others." *Criminal Justice Ethics, 28*(2), 168–200.

[42] Smith, T. (2012). "To Conceal and Carry or Not to Conceal and Carry on Higher Education Campuses: That Is the Question." *Journal of Academic Ethics, 10*, 237–242. doi:10.1007/s10805-012-9161-8.

[43] An interesting essay of perspective on campus carry is found at Makalani, M. (2016). "The Many Costs of Campus Carry." *The New Yorker*. Accessible at http://www.newyorker.com/culture/culture- desk/the-intellectual-costs-of-campus-carry.

BEGINNING THE POLICY DEVELOPMENT PROCESS

The experience of forum participants who had developed a campus carry policy showed that three critical factors needed to be in place before actually developing the language of the policy. These three factors established the context for policy development and implementation:

- Establishing the policy development structure
- Understanding the environment and context of policy implementation
- Conducting an analysis of the state legislation and other institutional concealed carry policies

Even though the specific provisions of law vary among the states, it was the consensus of the participants that having these components effectively in place would expedite the process and ensure that the policy was lawful, fair, and reflective of the needs of the institution.

Establishing the Policy Development Structure

Participants who had developed concealed carry policies on campus made it clear that campus public safety officials cannot make the institutional policy in isolation. There needs to be a committee consisting of critical stakeholders from across the campus. Beyond campus law enforcement, the central administration, faculty governance, student governance,[44] support staff representation, legal counsel, and relevant special interests[45] (which will vary by institution) must all be represented on the policy development committee. This not only permits a comprehensive policy but also provides "buy-in" from each constituent group.

The size of the policy development committee is dependent on the institutional culture and the personalities of the committee members. A small committee is more nimble and able to more quickly resolve discussions and make decisions faster. However, a larger committee will be more inclusive of campus stakeholders, with broader input on critical decision points. Basically, it is expediency versus representativeness, whichever best serves the needs of the institution.

Consideration should be given to an alternate model of having a smaller committee for policy development and a larger committee for policy implementation. This provides both expediency and representativeness. Once again, the characteristics and culture of the institution will largely drive these decisions.

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[44] Institutions of higher education have a long history of shared governance rather than hierarchical mandates as often found in business or government. As a result, it is important to embrace the shared governance model in the development and implementation of the campus carry policy, particularly because this issue can be so divisive. For more insight on shared governance, see Tagawa, K. (2012). "Understanding the Culture of Higher Education: What Is Shared Governance?" *The Higher Education Workplace Blog.* http://blog.cupahr.org/2012/07/understanding-the-culture-of-higher-education- what-is-shared-governance/.

[45] In this perspective, "special interests" does not mean those who advocate or oppose the policy. Rather, it refers to entities on campus that may have special legitimate concerns about campus carry, such as the athletics department, medical school, or counseling services, as examples.

Given the character of the institution in the community, particularly if the campus public safety officers are non-sworn, there may be value in having a representative from the host jurisdiction law enforcement agency on the committee. This is especially true in considering the law enforcement response from an outside agency to an on-campus complaint or incident that may involve campus carry.

Leadership on the committee varies by institution and is largely dependent on institutional culture and organization. Despite this, there tends to be heavy reliance on the campus public safety/police department to provide critical guidance, particularly on enforcement issues and capability. In this regard, it is important to have a strong relationship with the institutional counsel to ensure the policy is consistent with state law and to have support from the central administration for policy enforcement.

Understanding the Environment and Context of Policy Implementation

The environments of colleges and universities vary greatly, which can have an impact on the application of state laws as well as the depth and particularity of a concealed carry policy. These different environments provide the context for policy development and permeated the discussions of the "nuts and bolts" issues of policy development throughout the forum.

There are private institutions that have wider latitude in their discretion and application of policy and those persons who may enter the campus; because the institutions are private property, state campus carry laws do not affect them. Public institutions also vary in governance and the ability to restrict handguns. For example, some institutions are empowered by state law to enact their own ordinances, which are adjudicated in local courts; hence, policy and enforcement can be more definitive.[46]

While campus public safety officials have an overall comprehensive understanding of their campus environment, because of the complexity of many institutions, it is likely there are factors or circumstances that exist, particularly in new or emerging programs that may be relevant to the new policy. Thus, the multidisciplinary policy development committee is the best possible source of information to aid in a comprehensive assessment of the campus environment.

Oftentimes, a person's perspective of a "campus" reflects his or her personal experiences. However, the modern college or university campus can have many characteristics that may influence the development and implementation of a concealed carry policy in different ways. Among the factors to explore in understanding the environment are:

- **Institutions With Multiple Campuses**—Does the institution have multiple campuses with the same governing board, and will one policy meet the needs of all campuses? While the intuitive answer may be "yes," this

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[46] For example, Michigan has four universities that were created by the state constitution and are empowered to create ordinances that are adjudicated in local district courts.

needs to be explored in detail. For example, while there may be one governing board, each campus may have autonomous administrations that have different characteristics and different cultures as related to the concealed carry policy.

- **Unaffiliated Institutional Visitors**—Some institutions have large numbers of unaffiliated visitors as a result of sporting, entertainment, and cultural events. The policy needs to address the events, per se, as well as unaffiliated visitors to the events on campus. Similarly, the policy must address methods of communicating the policy to campus visitors and articulating policy compliance actions for campus public safety personnel.

- **Critical Facilities on Campus**—Some colleges and universities have critical facilities and programs, such as medical facilities and programs that may be related to sensitive federal grants and programs; for example, the U.S. Department of Defense, the U.S. Department of Homeland Security, the U.S. Department of Justice, and/or the U.S. Department of Energy research and technical assistance projects. Policy developers need to consider not only the substantive nature of the project but also whether there are funding "conditions and special conditions"[47] that would impact the policy.

- **Geography**—Urban institutions versus the more traditional college campus can provide unique challenges.[48] In some cases, colleges and universities have classrooms and offices in commercial buildings where there are an array of businesses alongside college classrooms and offices. Similarly, people unaffiliated with the institution may easily travel through campus-controlled zones in an urban environment and never know it. Part of enforcing policy, particularly as related to unaffiliated persons, is providing notice; however, signage that provides notice may not be effective in an urban environment. This provides challenges for policy development, implementation, and enforcement.

- **Resident Population**—Some institutions have substantial residential populations living on campus, while other institutions have a largely commuter population. These differences are reflected not only in institutional facilities but also in the differences in the characteristics and behaviors of the students.[49]

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[47] For the reader who is unfamiliar with the grant/cooperative agreement language of "conditions and special conditions," these are essentially contractual factors, requirements, and obligations that a grantee agrees to in order to receive the funding. The "special conditions" can vary widely depending on the nature of the funded project and the funding agency. As an illustration of special conditions, see https://www.justice.gov/sites/default/files/ovw/pages/attachments/2014/12/17/standard_special_conditions_grants.pdf.

[48] For an interesting perspective of urban versus rural campuses, see http://www.internationalstudentguidetotheusa.com/articles/rural_vs_urban_campuses.htm.

[49] Policy should be evidence-based to the extent that research is available. For interesting insight on this issue, see the doctoral dissertation *Comparing the Student Profile Characteristics Between Traditional Residential and*

- On a related note, the issue of residential campuses often focuses on the proportion of the student population that lives on campus, not the raw number of students. This is relevant because there can be a large residential university with less than half of the student body living in campus residence halls; the rest live in apartments often adjacent to the campus. A campus carry policy can control handguns in residence halls but not the presence of handguns in apartments that may be across the street. The distinction may make the difference in a person's decision to carry a concealed handgun. This point may be particularly relevant in officer training for policy implementation and enforcement.

- **Culture**—It was evident during the forum discussion that different cultures—different both geographically and institutionally—are more tolerant of handguns than others. One participant indicated that concealed carry was "not a big issue for our president." Another participant indicated just the opposite. Yet another participant stated that "guns are part of the culture" in that region of the country and that the presence of guns on campus (and in the community) was largely accepted. All of these factors must be understood because they will influence the type of policy developed, how it will be implemented, and how it will be enforced.

- **Activism**—Some institutions have experienced significant campus activism by faculty and students at the prospect of concealed handguns being carried on campus. While the activism will not affect the provisions of the state law, per se, it can have an effect on the structure of the campus policy and its enforcement. The state law will largely limit the strength of the policy's provisions; however, discretion in its enforcement can be significantly influenced by the concerns of the campus community. This should not be construed as any type of limitation on the lawful and constitutional rights of those persons lawfully carrying concealed handguns, but simply the policy's enforcement.

- **Institution Population and Geographic Size**—The size of the institution, in terms of enrollment, and the geographic size and character of the campus (e.g., public road going through campus property) may provide challenges for policy enforcement. While some institutions are geographically distinct from the host community, others are geographically integrated with the host community, with private businesses and residences adjacent to campus buildings. A pedestrian may walk a few blocks down a street and cross on and off campus property several times. Similarly, some institutions have a diverse array of public-private partnerships, including land use contracts that could have an impact on

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policy development and implementation. For example, a multimodal transportation hub in East Lansing, Michigan, that hosts an Amtrak station and bus station is on Michigan State University property. While none of these factors are barriers to an effective policy, they must be considered for design and enforcement.

- **Extended Campuses**—Some institutions have unique extended campuses, such as an agricultural research station, university farms, and other unique entities that are directly university-related and controlled, yet are nonprofit organizations such as a university foundation. Each can provide a policy challenge, perhaps requiring a special addendum in the policy, to ensure compliance with state law and seamless policy enforcement.

- **Enforcement Capabilities**—With respect to enforcement, campus public safety forces have differing capabilities and authorities. Some personnel are sworn, others are non-sworn, and in a few instances, campus public safety personnel are armed but non-sworn or sworn but not armed. These varying capabilities may pose complications for policy enforcement.

These different characteristics must be understood at the outset because they will have an effect on the design of the policy and may require special adaptation, including development of a justification to restrict handguns under state law.

Analysis of the State Legislation and Other Institutional Concealed Carry Policies

The NCSL provides a thorough overview of the trends related to state laws authorizing concealed carry.[50] While this is insightful for looking at trends, pragmatically, each institution must dissect the law its state legislature passes. Like many types of legislation, provisions of a statute are forged based on political ideology, tradeoffs posed by special-interest groups, and the need to get the votes to pass the legislation. That is not a value judgment but a practical recognition that legislation can have a great deal of variance in each state. As a result, it is necessary to assess the requirements and prohibitions in the specific legislation in an institution's state.

The NCSL has a 50-state bill-tracking database[51] that can serve as a resource, as does the Quorum US database.[52] Most colleges and universities have a legislative liaison office that is likely the most effective resource for identifying and monitoring state legislation. While there is value in monitoring proposed legislation, remember that provisions of statutes can change during reconciliation, and policy development must be based on finalized legislation. Doing too much work on proposed legislation could waste time and effort.

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[50] http://www.ncsl.org/research/education/guns-on-campus-overview.aspx#1
[51] http://www.ncsl.org/research/telecommunications-and-information-technology/ncsl-50-state-searchable-bill-tracking-databases.aspx
[52] https://www.quorum.us/

Despite the legislative status, planning for the new policy can begin. Just as state legislation will vary, there will also be some common provisions that institutions in other states have already addressed. As a result, there is value in soliciting and reviewing policies developed by other institutions to address these common provisions. It would be unusual if a policy developed by another institution could be implemented as a whole by a college or university. However, reviewing policies from other institutions, as well as their development and implementation lessons learned, can provide colleges and universities with useful road maps for policy development. Similarly, peer exchanges with other institutions that have developed and implemented concealed carry policies can provide invaluable insight into implementation and permit a detailed exchange of information that cannot be duplicated in phone calls and e-mail exchanges.[53]

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[53] As an example, the BJA Violence Reduction Network has successfully used peer exchanges in its programming. See https://www.vrnetwork.org and search the website for "peer exchange."

CRITICAL FACTORS IN THE DEVELOPMENT OF A CAMPUS CONCEALED CARRY POLICY

Conceptually, there is a wide array of challenges that must be considered in the development of a campus concealed carry policy. Broadly, critical questions identified by forum participants included:

- What buildings/areas may lawfully be excluded from the carrying of handguns, and what criteria can lawfully be used to justify that exclusion?
- What should be communicated to the campus community—faculty, staff, and students—about concealed carry on campus, and what are the best methods to communicate the message?
- How do we dissuade fears of increased handguns on campus that may be expressed by members of the campus community while at the same time reassuring statutory and constitutional protections for those who elect to exercise their concealed carry privilege?
- What are the fiscal and logistical impacts of a concealed carry policy on campus?
- What are the guidelines and thresholds for making campus events exclusion zones?
  - What is the rationale for the criteria, and how is that rationale consistent with state law that authorizes campus carry?
- What potential institutional liabilities may be exposed to the institution with a concealed carry policy?
  - How can those liabilities be minimized while staying in compliance with the state law?
- What are the best methods of educating campus visitors about the concealed carry policy?
  - What sanctions or alternatives can or should be applied for non-campus-affiliated visitors who have a concealed carry permit but violate campus policy?
- In developing the policy, what restrictions or exclusions should be applied to faculty, staff, and students?
  - Are those restrictions the same?
  - What is the rationale for the restrictions?
  - What are the sanctions for faculty, staff, and students for violating the policy?
    - Is there discretion for the sanctions or is it a no tolerance policy?
- What kind of training is needed for law enforcement or public safety personnel associated with concealed carry on campus?
  - What kind of training needs to be presented on stopping a person (i.e., reasonable grounds) following a concealed handgun call or observation and the circumstances that warrant an encounter?
  - What kind of training needs to be offered on the process of encountering a person who may be armed?

- What kind of training needs to be presented on how to handle complaints from campus community members who "simply do not like" concealed carry?
- What kind of training needs to be offered on balancing the actions of those who are lawfully carrying a concealed handgun and those who carry a handgun into an exclusion zone as a "protest," not a threat?
- Should training be provided or made available for those who have concealed carry permits on how to react to an active shooter on campus, including encountering the police response?
- What cooperation, communications, and logistical factors are needed with the law enforcement agency in the host community?

The findings of the forum address these and other issues. While in many cases there are no definitive answers to the questions, a process is provided to help lead an institution to the appropriate answer for its specific circumstances and environment.

The participants identified eight critical factors that should be addressed to integrate campus carry in the institutional environment:

1. Policy
2. Legal
3. Education
4. Implementation
5. Training
6. Research and Evaluation
7. Communication
8. Culture/Climate

Policy

The first step is analyzing the provisions of the state's law. Two core questions that must be answered are: What is required? What can be excluded? It is good practice to have the college or university counsel provide answers to these two questions so the policy development committee can have the best information possible as a foundation to start.

For example, the University of Texas at Austin approached policy development in a comprehensive, inclusive manner. The university established a broad-based working group to study the issue from a comprehensive perspective, with subcommittees examining issues of specific concern. A key purpose for this approach was to get stakeholder buy-in of the policy. In the end, the working group prepared a report[54] with explicit recommendations to the university administration, which then developed the policy.

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[54] https://utexas.app.box.com/v/CCWorkingGroup-FinalReport

Importantly, there will likely be members of the campus community strongly opposed to campus carry who will want the policy to be as restrictive as possible. It is essential for leadership to make it clear that the policy is in response to a state law and that both allowances and exclusions for campus carry must be consistent with the statute's provisions. The following points should be considered during the policy drafting process:

- Review policies developed by other institutions for ideas and language.
- Develop a consensus on exclusion zones, including the defensible rationale for designating each location as an exclusion zone.
- Ensure that the provisions of the policy are definitive, understandable, and easy to follow.
- If the policy will require handgun storage options or requirements for students and/or employees, develop explicit procedures and ensure that the costs are clearly stipulated and consistent with state law.[55]
- Several participants stated that their campus used a Behavioral Intervention Team (BIT) to monitor "red flag" behavior related to concealed carry on campus and suggested it be considered as part of the policy.[56]
- Depending on state law, consideration should be given to making a statement about liability on behalf of the institution, noting that concealed carry on campus was being authorized only as a result of state law, not as a proactive decision of the institution.
- If students and/or employees are required to register weapons on campus as part of the policy, care must be taken to ensure confidentiality of the registration records. Based on forum comments, the need for confidentiality varies widely based on different state laws relating to not only campus carry but also provisions related to employee and student records. Each institution should explore this issue to see whether its applicability can be appropriately codified in the policy.

Participants also cautioned not to make the policy too detailed or too complicated—the explicit phrase used was "do not over-policy." The implication was that if the policy is too complex, has too many exclusions or caveats, or has unduly complicated procedures (sometimes intended to discourage a person from carrying a handgun on campus), then it becomes too difficult to enforce. Moreover, it could draw challenges that would undermine legitimate exclusions. While participants understood that there are stakeholders who are opposed to the statute, their best advice was to approach the task with straightforward simplicity. The policy must reasonably address stakeholders' concerns while complying with state law in an easy-to-understand manner.

Forum members stated that while weapons storage may be a component of the campus policy (e.g., specifying that a handgun must be placed in a locker before

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[55] As examples, see http://police.colostate.edu/weapon-storage-and-information/ and http://utpolice.utk.edu/services/weapons-storage/.
[56] For more information, see the National Behavior Intervention Team Association, https://nabita.org/.

entering a certain exclusion zone), the actual mechanism for handgun storage should be a separate policy and procedure created through a process including campus public safety officials. Since they would likely be the campus entity managing firearms storage, they would have a better understanding of the needs and could more readily amend the policy, if needed, rather than having to rely on the broader campus policy development committee.

Another aspect of policy, beyond the campus concealed carry policy, deals with law enforcement response to calls of an armed person on campus as well as the responsibilities and actions of lawfully armed students or staff who encounter a person in a use-of-force situation (e.g., serious crime in progress, active shooter, or shots-fired situation). Campus public safety should develop these directives, in conjunction with the host jurisdiction law enforcement agency, as appropriate. There are two main issues associated with this that should be considered.

The first issue is response to a call of an armed person on campus. Dispatchers must be trained to probe for as much detail from the caller to determine whether a person was simply seen in possession of a firearm or whether the person was actually posing a threat with the weapon. Detailed facts are necessary to inform the responding officers and ensure the safety of the campus community and responding officers.

The second issue is the responsibility of lawful handgun carriers on how to respond if they encounter a use-of-force situation, including their behavior and responsibility when law enforcement arrives at the use-of-force location. Training programs, which may have to be voluntary for students, for handgun carriers should be made available. Additional educational approaches such as informational brochures, a web page, and social media posts on proper and safe behavior in these situations should also be considered.

Finally, the policy development committee should be fully informed by legal counsel of potential liability issues that emerge on the campus carry issue. The policy should be developed to effectively address reasonably potential liability issues with supporting action—including public information, public education, stakeholder training, and officer training—to minimize negligence that could lead to liability of the institution.

In sum, the campus carry policy must be:

- Consistent with the provisions of state law
- Reflective of the concerns of campus stakeholders to the extent possible within the confines of the state law's provisions
- Written in a manner that is easily and clearly understood
- Comprehensive, but not unduly complicated
- Minimizing of negligent behavior and potential liability

Legal

The policy development process must necessarily involve legal counsel consultation and resources. Forum participants recommended identifying legal counsel who could advise the committee during policy development and identifying legislative contacts and a liaison with the state Attorney General's office. They also recommended that institutional legal counsel consult legal counsel at other institutions in the state to share information, interpretations, and issues. Unanimously, participants stated that legal counsel was a necessary resource for policy development. However, it was also stressed that while legal counsel should be utilized as a *resource* for policy development, they *should not drive* the policy development; that was the responsibility of the stakeholders on the policy development committee.

There are a number of issues with legal implications, perhaps the first of which is to determine the time constraints for implementing the campus policy. Invariably, state legislation will have a specified date wherein a new statute becomes effective. While state statutes may not require colleges and universities to develop concealed carry policies, they typically permit the development of such policies for control of handguns in sensitive areas and campus residence facilities. Understanding these parameters and time constraints is an essential starting place for developing campus policy and procedures.

Often in legislation, there are provisions that lack precise clarity and are open to interpretation. While ultimate interpretation is made by the courts if a statute or a policy is challenged, there must be some form of interpretation of those unclear provisions during the policy development process. It was recommended that those provisions that have alternate interpretations be identified, with legal counsel providing arguments and rationale on different interpretations. The committee should then decide on the interpretation that best reflects the stakeholders' positions. Legal counsel should also aid in the wording of the provisions of the policy and provide language for the justifying rationale.

Participants noted that most institutions already have some type of policies related to the carrying or presence of handguns on campus. In many cases, there are separate policies related to students, employees, and campus visitors. In addition, there may also be peripheral policies and regulations that may have been implemented by specific campus entities such as the athletics department or college of medicine. As a result, an important role of the institutional legal counsel is to identify any such policies or regulations and aid in deconflicting them with the new campus concealed carry policy; in essence, ensuring that there is one clear and consistent policy campus-wide.

The forum frequently found that stakeholders would often "push the limits" in identifying exclusion zones. One of the best methods to address this issue was to have stakeholders develop their rationale for the exclusion zone and then have legal counsel review the rationale. This process would accomplish two important purposes. First, it would provide a method to strengthen the rationale for the exclusion as per state

statute. Second, based on the rationale, legal counsel could explain why a location could or could not be excluded from campus carry. On this last point, exclusion zones would often change because in some cases exclusion is based on the event or the use of a facility, not the facility, per se.

A final legal issue discussed by the participants that related to campus carry, but is not actually part of the policy, was mental health—specifically the concern about the potential carrying of a handgun by a person with a mental illness. The Health Insurance Portability and Accountability Act (HIPAA)[57] privacy rule has limitations on the types of information health care providers can release to other persons, including law enforcement. Participants expressed the need to develop a policy and process for lawfully prohibiting a person with a demonstrable history of violence or a person who poses a demonstrated threat to themselves or others from carrying a concealed handgun. The forum participants indicated this was an important issue to address proactively in order to swiftly and lawfully deal with the issue, should it arise.

Education

Once the policy has been developed, the next step is educating faculty, staff, students, and campus visitors about the provisions of the policy, exclusions, responsibilities, and actions if stopped by a police officer or encountering a use-of-force situation. It should be remembered that education on the policy is not a one-time activity but is an ongoing process that begins prior to policy implementation to inform the constantly changing members of the campus community and visitors to the campus.

When restrictions are placed on legal behavior, a core responsibility of an institution is to provide notice of the restrictions and consequences for violating them. This is a fundamental component of educational initiatives. Different methods and platforms of education need to be employed in order to comprehensively inform stakeholders and visitors. For example, orientation sessions for incoming students should include a module on campus carry to explain the policy. Similarly, orientations for all new faculty and staff employees should include a module with emphasis on how the policy may affect their responsibilities. A challenging aspect of education is not only reinforcing the policy requirements or prohibitions to stakeholders but also educating unaffiliated visitors to campus events, as well as persons who simply happen to be transiting through campus property.

As a result, multiple approaches to educating stakeholders and campus visitors about the campus carry policy should be used. Platforms used and recommended by the forum participants included:

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[57] For more information on the HIPAA privacy rule, see https://www.hhs.gov/hipaa/for-professionals/special-topics/mental-health/.

- Online information, including frequently asked questions[58]
- Online training (while institutions may not be able to require it for students, it should be made available for those who want it, perhaps by providing some type of incentive for those who participate in the training program)
- Mandatory training, where permissible by law (online or in class), for institutional employees who elect to carry a concealed handgun on campus
- Use of various social media platforms
- Signs and placards
- Public Service Announcements (PSAs), including PSAs in conjunction with athletic, theater, and other public event news
- Ongoing information pushed to students through the center for campus life or office of student affairs (or similar entity)
- Education and reinforcement through the residence hall association and resident assistants
- Awareness and education through counseling centers
- Targeted information available for parents and family members of students
- Education and assistance through employee collective bargaining units as available
- Education through the academic governance mechanism at the institution, such as a faculty senate

One creative approach was used by the University of Texas System.[59] The system-wide chair held weekly conference calls during which each of the academic and health campuses would share his or her working group reports and approaches to educate stakeholders. Forum participant Dr. Alex Piquero, chair of the University of Texas at Dallas committee, stated:

> This was helpful in one sense to learn about what each of the campuses were doing and struggling with regarding making policy out of the law, but also getting insights from [the] System OGC (Office of General Counsel), media relations, and other officials. Some future readers may have that as part of their process (and the System working group, which all the local campus heads were part of, created their own System report that is available at https://www.utsystem.edu/sites/default/files/documents/Memorandum%3A%20Recommendations%20Regarding%20Concealed%20Carry%20on%20Campuses/2016-01-11concealed-carry-recommendations.pdf.[60]

While the avenues for education are diverse, participants stressed that to be most effective, the institution needs a "champion" to lead the efforts to educate

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[58] As an example, see http://www.kansasregents.org/resources/PDF/About/Governance/FAQ_on_concealed_carry_policy_Final.pdf.
[59] http://www.utsystem.edu/news/2016/01/12/working-group-concealed-carry-completes-report
[60] Personal correspondence between Dr. Alex Piquero and the authors.

institutional stakeholders and visitors on the campus carry policy. The champion's role is not as an advocate or opponent of campus carry but as the leader of the education and awareness effort to ensure the message is consistent, accurate, and ongoing.

Today, most colleges and universities have training and education for campus stakeholders on their options for responding to active shooter incidents. The forum suggested that components of the campus carry policy be incorporated into active shooter training to inform those who carry handguns on expectations of their behavior and their responsibilities during these incidents. The training should be pragmatic, objective, and based on the institutional policy. Common active shooter courses in which this information could be included are:

- Alert, Lockdown, Inform, Counter, Evacuate (ALICE) [61]
- Civilian Response to Active Shooter Events (CRASE)[62]
- Run. Hide. Fight.® active shooter preparedness and response[63]

Finally, beyond the campus carry policy, educational efforts need to include information for stakeholders about police response to calls of an armed person or a use-of-force situation so stakeholders, campus public safety, and host jurisdiction law enforcement agencies will all know the policies and procedures for such calls and incidents.

Implementation

Participants stated that the implementation of the campus concealed carry policy is a critical stage. It has both pragmatic policy elements and broader concerns for dealing with the behaviors and, in some cases, the emotions of the campus community.

To begin, it was stressed that there are budget implications for policy implementation. Virtually every aspect of the implementation plan will have direct or indirect costs associated with tasks, including: web development, social media presence development, printing brochures, making signs, hiring new staff to manage the concealed carry program, developing and presenting training and education sessions, and the purchase, management, and maintenance of the required equipment (most notably handgun safes). Different options for covering the direct and indirect costs of the policy implementation were discussed in the forum, such as:

- Student user fee systems (campus registration fee, weapons safe fee)
- Student universal fee system (this would essentially be one of the many small fees imposed on all students when they register)
- Employee registration fee
- Absorption of costs by the budgets of the units involved in implementation

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[61] https://www.alicetraining.com/
[62] http://alerrt.org/course_types/view/98
[63] https://www.dhs.gov/active-shooter-preparedness

- A special appropriation budget by central administration devoted to campus carry implementation
- Request a budget supplement from the state as a result of new costs incurred for the new state law

While all participants indicated the need for a budget, their experience varied widely on how they prepared the program budget, based on such factors as provisions of the state empowering statute, institutional budgetary policy, commitment by central administration, and budget idiosyncrasies of different institutions.

Once funding is established, the implementation structure can move forward. Experience has shown that the implementation of the campus concealed carry policy may be more effectively accomplished by using a somewhat different structure than the policy development committee, with membership targeted to persons with a diverse array of skills related to implementation.

Participants suggested that implementation committee membership might include representatives from the following:

- Office of the Provost
- Office of the Dean of Students
- Public safety
- Faculty governance
- Student governance
- Counseling services
- Institutional relations/communications
- Infrastructure planning and facilities/physical plant
- Residence hall system/housing
- Legal counsel
- Event services
- Institutional physician/health services
- Institutional risk management
- Human resources
- Information technology
- Athletics

It was suggested that committee initiatives would be most effective working in targeted subcommittees, with the committee of the whole consistently informed of their initiatives and status. These are principles of general guidance, with the recognition that each institution will have unique needs. For example, at colleges and universities where employees are members of collective bargaining units, there would be value in having a union representative on the implementation committee to assist with employee campus carry implementation.

Forum members also suggested that an implementation plan be developed that includes:

- Designation of the date the policy goes into effect
- A timeline of critical milestones to be accomplished
  - Types of training and training dates
  - Changes to facilities (e.g., signage, weapons safes installation)
- Meeting dates for the committee of the whole
- Meeting dates for the subcommittees

Participants stressed that portions of the implementation are a perpetual process. Specifically, because the student body substantially changes each year and there is a turnover among faculty and staff, portions of the implementation process would have to be repeated annually.

Behavioral and Emotional Aspects of Implementation. Experience has shown that during the initial implementation, there will be angst among some members of the campus community because of their fear of the presence of handguns being carried on campus. Fear is an emotion that can influence a person's beliefs, assumptions, and behaviors, regardless of the facts, yet it can be effectively addressed.[64] While a true threat may not exist or may be minimal, the fear is nonetheless real to those who experience it. As a result, it can influence their behavior and drive their reactions to real and perceived threats.[65] This is an issue that will influence some members of the campus community as the policy is implemented.

While fear is real to those experiencing it, there are steps that can be taken to reduce fear and anxiety, such as addressing the points of fear with facts not only by providing brochures and social media but also meeting with members of the campus community to answer questions and have a dialogue. The approach by campus officials in these situations should be empathy, not advocacy.

Forum members stated that an important component to incorporate is the campus counseling center. The use of the center for concerns about campus carry varies widely depending on the culture of the institution; nonetheless, representatives of the counseling center who are aware of the issues and prepared to deal with campus community members who need this service should be available.

As noted previously, several participants recommended that the campus BIT be involved. The purpose of the BIT multidisciplinary group is to support a target audience (e.g., students, faculty, staff) via an established protocol. The team tracks "red flag" behavior, patterns, trends, and disturbances of individuals or groups. When improper or disruptive behavior is identified, such as irrational or threatening behavior by a person

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[64] An article in *The Atlantic*, unrelated to campus carry, that addresses the irrationality and psychology of fear in a clear manner provides useful insight. See http://www.theatlantic.com/health/archive/2014/10/the-psychology-of-irrational-fear/382080/.
[65] An insightful article on the issue of fear, anxiety, and behavior from the National Institutes of Health can be found at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3181681/.

who is carrying a concealed firearm on campus, the BIT conducts an investigation, performs a threat assessment, and determines the best method to reconcile the problem.[66]

A final behavioral aspect to consider is that persons who have a concealed carry permit will likely want to exercise their new privilege. As a result, in the early days of the policy, there may be an increased number of persons who carry their handguns on campus. With the potential increased numbers of persons on campus with handguns, coupled with the emotion of those who oppose the policy, the probability is higher that there will be an increase in calls and complaints about armed persons. Campus public safety and the host jurisdiction law enforcement agency must be prepared to appropriately respond to these calls.

Policy and Pragmatic Aspects of Implementation. Fear can be assuaged to some degree by explaining how the public safety community will respond to handgun issues, the type of training they have, and their response plans. Most campuses already have a phone/text/e-mail notification system in place—this should be part of the response plan that is discussed with stakeholders.

Campus public safety should also be prepared for the potential of demonstrations on campus by persons opposing the policy. Any such demonstrations should be managed in the same manner as any other lawful public demonstration (by using the Incident Command System protocols),[67] with public safety controls to protect both the demonstrators and non-demonstrators alike.

The forum participants reported that a number of institutions had made handgun safes available for campus stakeholders and visitors. In some cases, the handgun safes were part of the campus carry policy, while in other cases they were made available as a convenience. Options also discussed were whether to have one centralized weapons safe versus having smaller handgun safes at locations of primary exclusion zones. The distinctions were found in the difference of having a staffed handgun safe or having keyed "self-service" handgun safes at exclusion zones. Each institution needs to evaluate these different factors as they best align with state law and policy. If handgun safes are used, processes and facilities need to be made for students in residence halls, employees, and campus visitors, depending on the policy requirements and facilities involved. One approach applies to students who live in residence halls versus handgun safes for employees versus handgun safes for campus visitors. As one forum member stated with respect to the use of handgun safes, "The process [for use of the safes] needs to be convenient, consistent with the spirit of both law and policy, and not onerous."

Another policy aspect of implementation is the development and maintenance of a firearms records management system. Some institutions are required to have

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[66] https://nabita.org/behavioral-intervention-teams/
[67] The National Incident Management System is recommended. See https://www.fema.gov/national-incident-management-system.

stakeholders register their handguns (and rifles or shotguns for hunters and shooting club members) with the public safety or police department. This registration may apply to employees, students, and/or visitors (or there may be no permitted registration based on state law). In cases where registration is required or permitted, by statute, that information may have to be held confidentially, with personally identifiable information (PII)[68] about weapons permit holders not released by public safety officials—this includes not releasing the PII to the central administration.[69]

A final implementation issue for policy, as the experience of some participants shows, is that some calls to police about persons reportedly with a handgun may be a result of people not fully understanding the policy, particularly the aspect of what is considered a "concealed" handgun. Experience shows two approaches to these calls are largely dependent on the culture of the campus. One approach is to strictly enforce the policy immediately to send the message that there will be no tolerance in policy violations because of the seriousness and sensitivity of handguns on campus. The second approach is to use encounters with persons carrying a concealed handgun as a "teaching moment" to educate them on the policy requirements and release them with a warning on the first encounter. There are many variables in these decisions, and while a rigid policy on the disposition of these instances is not suggested, discussion of the issue and the general principle is a wise implementation component.

Experience by the participants has shown that despite how well the policy is crafted and how inclusive the policy development process is, implementation brings new challenges and focuses a light on unanticipated problems. The administrative mechanism for the campus carry policy must be flexible and reasonable to adjust to needed refinements.

Training

During the forum, training became a recurring theme on many points. For purposes of this discussion, training is the development of skills and the application of procedures to support the effective implementation of the campus carry policy. Some training may be required (such as for employees); other training may have prohibitions from being required (such as for students or campus visitors). In the latter cases, it can be encouraged, even incentivized, and made easily accessible to encourage participation.

Venues or platforms for training should be multifaceted, including: stand-alone in-class training sessions; training integrated with other programming such as new employee orientation; training options for students during student orientation; videos; roll call training; and online training.[70] Care should be taken to document all training participants, including the course that was taken, when it was taken, and the amount of

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[68] To better understand the nature and importance of PII, see https://www.gsa.gov/portal/content/104256.
[69] As an illustration of weapons registration for employees, see http://www.utc.edu/police/services/concealed-carry.php.
[70] An example of an online campus carry training program from the University of Texas at San Antonio can be found at http://www.utsa.edu/compliance/CampusCarryTraining.html.

time it took. If there are assessments of the training, such as an online test, that should also be documented. If a firearms incident, such as an active shooter, should occur on campus that involves a person carrying a concealed handgun consistent with the policy, effective training could help prepare the handgun carrier involved in the incident. Training records can also help defend the institution should a lawsuit be a derivative of the incident.

A training plan should be developed and include learning objectives, the training platforms, a schedule, the trainers and evaluators, and a budget. To the extent possible, the costs for campus carry training should not be taken from existing public safety training funding. Forum members noted that their training budgets barely covered the costs for the required training. So-called "add-on" training, as represented by campus carry, needs to have separate resources committed to meet the anticipated needs.

Students. While the preference of participants was to be able to provide a training program for students on campus carry, there were significant questions about whether it could be required. This is due to the relationship of the institution with students and the character of the state empowering law. The area of law and policy on this issue is not well settled; hence, forum members sought to take the approach that students may not be required to take training (depending on state law); however, options would be made to offer training programs, make them easily accessible, and encourage students to enroll.

The first formal on-campus exposure of new students to the campus carry policy should be at their orientation. All students should be made aware of the policy, its core requirements, and where they can gain more information on campus carry. While the orientation is not considered training, it can inform students of training programs and encourage their enrollment.

For those who choose to carry consistent with state law, an incentive for successful completion of the training could be a discount on handgun safe fees. If the training program has sufficient hours, the student could earn one semester academic credit of an independent study, or the student may simply earn coupons for a discount on books or merchandise at the campus bookstore. The ultimate goal is to ensure that students are as informed as possible, and incentives can be a good mechanism to accomplish this.

Examples of student training content may include:

- What is meant by "concealed" and the obligation to maintain concealment
- Obligations either to not enter an exclusion zone or to store the handgun
- Rules on firearms[71] for residence hall visitors
- Rules on firearms storage on campus for those living in residence halls

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[71] These factors recognize that not only handguns may be brought to campus but also rifles and shotguns for hunting and participation in a shooting club or an athletic event such as a biathlon.

- Rules on firearms storage in vehicles
- The need for a state concealed weapons permit, where required by the state, for a handgun
- Registration for campus residents
- What to do if confronted by a police officer concerning the handgun
- Actions if encountering a violent crime or use-of-force situation when no police officer is present
- Actions to take when a person is armed at a use-of-force incident and police officers are responding

Faculty and non-public safety staff. It was generally agreed that the faculty and staff relationship with the institution in the context of employee-employer was different from the student relationship, resulting in different applications of the campus carry policy. For example, depending on state law, an institution could require faculty and staff who elect to carry a concealed handgun to attend a mandatory training program as a condition of employment. Many of the basic topics of the training program for employees would be similar for students; however, there are important differences—notably, the issue that if an employee is carrying a handgun under the guidelines of institutional policy, the institution could be vicariously liable for negligent actions of the employee in a use-of-force situation. The point of this document is not to discuss the specific legal aspects of liability, due to variances among states, but to note the different context of training employees as compared to students. Among the employee training topics recommended by the participants were:

- The role of a supervisor who has employees who are lawfully carrying concealed handguns
- What is meant by "concealed" and the obligation to maintain concealment
- Decisions either to not enter an exclusion zone or to store the handgun, even if a work assignment requires entry to the exclusion zone
- Rules on handguns in residence halls for employees who have to enter residence halls for a work assignment
- Rules on handgun storage in vehicles
- The need for a state concealed weapons permit for a handgun, where applicable
- Mandatory registration and training for employees
- What to do if confronted by a police officer concerning the handgun
- Actions to take if encountering a violent crime or use-of-force situation when no police officer is present
- Actions to take when an armed employee encounters a use-of-force incident and police officers are responding

Public safety and law enforcement officers. It was recommended by participants that joint training be conducted with campus public safety or police officers and host jurisdiction law enforcement officers on the campus carry policy. More important was a joint training on concealed handgun calls and complaints and responding to a use-of-force situation on campus. The reason for joint training is to

ensure deconfliction of response procedures between the campus and host jurisdiction agencies. Forum members also stressed that such training would help sensitize the host jurisdiction officers to the institutional culture and expectations on campus carry.

Training for public safety and law enforcement officers should include the components of the campus policy, exclusion zones, and other topics similar to student and employee training so all personnel will be familiar with the regulations and the types of information campus stakeholders receive in training. However, it was universally agreed that officers need to receive training in greater depth and breadth, including areas that are tangential to the specific components of the campus carry policy but are relative to encounters in campus carry situations, including use-of-force situations.

It was noted that joint training, including exercises, on active shooter situations would enhance campus safety and unity of the response. On the issue of campus carry, this type of training would also allow public safety and law enforcement responders to be aware of the need to resolve encounters during an active shooter situation when a student or employee was lawfully carrying a handgun at the location of the active shooter incident. Safety and security of the campus is a priority, but training must be in place to help responders distinguish a lawful concealed permit holder from an active shooter or a criminal suspect.

Participants also recommended training that prepares officers to respond to persons with a handgun who violate the policy and yet assert they are exercising their Second Amendment rights. Officers should have a tolerant, informed approach explaining that, like all rights, there are exceptions that can be made for public safety. The U.S. Supreme Court held that the Second Amendment guarantees an individual the right to possess a firearm in the home for self-defense.[72] However, later the Court went on to state:

> We made it clear in *Heller* that our holding did not cast doubt on such longstanding regulatory measures as "prohibitions on the possession of firearms by felons and the mentally ill," "laws forbidding the carrying of firearms in sensitive places such as schools and government buildings, or laws imposing conditions and qualifications on the commercial sale of arms." [73]

As a result, state campus carry laws and institutional policies may impose restrictions that are consistent with the Supreme Court's holdings.

Forum members emphasized that public safety and law enforcement training related to campus carry should also include diversity training. Examples include:

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[72] *District of Columbia v. Heller,* 554 U.S. 570 (2008).
[73] *McDonald v. City of Chicago,* 561 U.S. 742 (2010).

- The Anti-Defamation League's (ADL) Anti-Bias Training for Law Enforcement Professionals[74]
- National Crime Prevention Council (NCPC) Strategy: Raising Cultural Awareness[75]
- Center for Human Diversity's Cultural Competency 101 Training Package for Law Enforcement Personnel[76]
- The Office of Community Oriented Policing Services (COPS Office) also has a wide range of useful resources on policing diverse populations[77]

It was further recommended that officers be trained on responding to active shooters,[78] including the Advanced Law Enforcement Rapid Response Training (ALERRT)[79] program. From another perspective, it was urged that sworn officers receive training from BJA's VALOR training and technical assistance program on officer safety and resilience.[80] In relation to this, it was suggested that officers receive training on mental health issues and Crisis Intervention Training (CIT).[81] Many campuses have mental health training programs available to employees that may be leveraged to support the needs of campus carry implementation.

Research and Evaluation

Despite the amount of care taken to develop a policy, provide education, implement a policy, and deliver training on the application of the policy, the question remains: "Is it working?" The importance of research and policy evaluation is to answer this question.[82] In policing, the growth of evidenced-based practice has expanded significantly,[83] and its value has long been established in many disciplines. As a result, research and evaluation should employ an evidence-based approach.

Evaluation typically focuses on two aspects: process and outcomes.[84] Thus, research needs to focus on procedures (are they working as planned?) and effectiveness (are the intended goals being achieved?). Invariably, during a complex policy development and implementation process, factors will be overlooked and/or not function as anticipated. These are not failures but are evidence that processes need to be refined in order to achieve the envisioned objectives. As a result, there are multiple data sources that can be effectively used to gain information needed for the evaluation.

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[74] http://www.adl.org/education-outreach/anti-bias-education/c/anti-bias-training-for-law.html?referrer=https://www.google.com/#.WL8POW_yvIU

[75] http://www.ncpc.org/topics/hate-crime/strategies/strategy-raising-cultural-awareness

[76] http://www.centerforhumandiversity.org/PoliceDiversityTraining.php

[77] https://cops.usdoj.gov/Default.asp?Item=2861

[78] The U.S. Department of Homeland Security has resources for dealing with active shooters, with specific orientations for average citizens, security professionals, and law enforcement. See https://www.dhs.gov/active-shooter-preparedness.

[79] http://alerrt.org/

[80] https://www.valorforblue.org/

[81] http://www.nami.org/Law-Enforcement-and-Mental-Health/What-Is-CIT

[82] For more information, see https://www.socialresearchmethods.net/kb/intreval.php.

[83] As an example, see http://cebcp.org/wp-content/evidence-based-policing/Sherman-TripleT.pdf.

[84] See http://tsne.org/blog/process-evaluation-vs-outcome-evaluation.

On the issue of data sources, there is an important line between data that are being collected and retained for operational public safety purposes and those that are being collected and retained for research and evaluation purposes. Because of regulations associated with the protection of human subjects in research,[85] any data on stakeholder and visitor behavior that are collected should be confidential, with consideration that data collection plans be reviewed by the Institutional Review Board (IRB) for approval. (In most cases this data collection will likely be classified as "exempt"; however, attending to this issue will minimize problems.[86] All institutions of higher education that have any type of research activity will have an IRB.)

Because of the different types of data needed for a thorough evaluation of processes and outcomes, a mixed-methods approach would be the most effective. Several different methodologies may be considered for data collection—choosing the methods will depend on the defined needs of the administration and the availability of the data. Engaging a faculty researcher who is part of the policy development team, perhaps along with graduate research assistants, to develop the evaluation effort will add validity and reliability to the findings. Among the data sources and methods that may be considered are:

- *Encounter data collection.* While basic information may be recorded in the computer-aided dispatch system (CAD), it can be more thorough if a short report form is available to record data by the responding official following any type of encounter or call associated with campus carry. The official would simply check items on a form or enter the data in a mobile user interface that records the date, the time, whether it was a call for service or officer-initiated action, the nature of the complaint, and various issues about the encounter, including the resolution. These data can be easily monitored in the aggregate.
- *Survey of stakeholders.* A survey of students, faculty, and staff members can collect data on both experiences and perceptions about the impact of concealed carry on campus and the functional aspects of the concealed carry policy. *Perceptions* and *experiences* will invariably be different; hence, there is value in collecting both types of data. Problems that emerge in perceptions can be addressed through communication and education, and problems that emerge with experiences can be addressed through refinements to policy implementation.
- *Collection of data on weapons violence on campus.* Official data reported through the Uniform Crime Reporting system,[87] with special attention to crime reporting on campus as a result of the Clery Act,[88] can provide

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[85] The protection of human subjects in research has its genesis in medical research; however, over the years, these protections have been applied to virtually every aspect of research. It is a critical issue, and for caution, deference should be given to the regulations in evaluative research. For a brief background on the protection of human subjects, see https://www.hhs.gov/1946inoculationstudy/protection.html.

[86] As an example, see http://www.apus.edu/academic-community/research/institutional-review-board/index.

[87] See https://ucr.fbi.gov/nibrs/crime-in-schools-and-colleges and https://www.fbi.gov/stats-services/publications/campus-attacks and http://clerycenter.org/clery-act-compliance-resources.

[88] For insight, see https://www.ncherm.org/pdfs/cca02wp.pdf.

some perspective. However, official data are usually about a year old and can have some variations in coding. Using current data from the campus public safety or police department (or the host jurisdiction police department, depending how the data are recorded) can provide more timely insights.

- *Collection of data on stolen and lost weapons.* In one study sponsored by the National Academy of Sciences, it was found that "most guns used in crime have been stolen or transferred between individuals after the original purchase."[89] Having data on stolen or lost weapons correlated with gun crime on campus, in the host jurisdiction, and in neighboring jurisdictions may provide useful insights.

- *Collection of data on firearms brandishing calls or offenses.* While these types of data can be very informative as related to the campus carry policy, they are not reported in the Uniform Crime Reporting system. Hence, a direct data collection effort by campus public safety and host jurisdiction agencies needs to be pursued to understand the character and depth, if any, of the issue.

- *Collection of data on exclusions violations.* These data will be available only from the campus public safety or law enforcement organization responsible for on-campus response and enforcement of exclusion zones. If there are a notable number of exclusion violations, an intuitive conclusion may be that persons carrying a concealed handgun are not abiding by the policy guidelines. However, analysis needs to probe deeper to ensure that exclusion zones are clearly identified and that the individual carrying the handgun understands the guidelines and knows his or her alternatives. For those who write policies and procedures, the intent is always clear; however, for those who have to interpret those guidelines, the clarity is not always as robust.

- *Collection of data from host jurisdictions' and neighboring jurisdictions' law enforcement agencies on firearms offenses or encounters involving students and employees.* Campuses do not exist in isolation, and as noted previously, many campuses are physically integrated into their host communities. As such, it is reasonable to assume that the probability exists that firearms encounters may occur between campus stakeholders and host jurisdiction agencies. Care must be taken in drawing conclusions about these incidents; however, they should be noted in the mosaic of the campus carry evaluation.

- *Interviews and case studies.* Empirical data provide invaluable insight about trends in behaviors. However, interviews and case studies provide more granular details about an incident. As an example, in one case, a university student was detained by a university police officer for firing a handgun on campus. Further investigation found that the student lived in a university-owned home that was located on a university farm that was in a rural area over three miles from central campus. As it turned out, the student was firing at a target for practice in what was essentially the rural

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[89] https://www.ncjrs.gov/txtfiles/fireviol.txt

backyard of his home. While technically this was a violation of university policy, the facts and the intent were clearly not at the heart of the university handgun policy. Interviews and case studies can provide valuable context to understand the data.

Data and information provide invaluable insight; however, an important caveat must be reinforced. There is a tendency in law enforcement to collect as much information as possible on individuals in order to understand and mitigate public safety threats. On campuses, as indicated from the previously cited research, there is broad opposition to campus carry. Similarly, public safety and law enforcement see aspects of campus carry that increase jeopardy to the campus community with increased numbers of handguns on campus, which can be aggravated by an encounter with an active shooter or violent crime in progress where a person who is lawfully carrying a handgun is present. Despite these intuitive reactions, objectivity and the rule of law must take precedence, wherein the rights of all parties must be protected, including protection of the personally identifiable information and lawful behaviors of those who are lawfully carrying handguns on campus.

As a final point on the value of research and evaluation, beyond their intended purpose to define the parameters of efficacy of a campus carry policy, there is an additional pragmatic benefit. In measuring the efficiency of the processes and the effectiveness of the outcomes, research and evaluation can also be used to show good-faith efforts by the institution to address campus carry issues and thereby lessen the chance of negligence should there be a lawsuit.

Communication

Education and communication have interactive roles but different purposes. The goal of education is to substantively inform stakeholders and visitors about campus carry policies, procedures, obligations, and repercussions for policy violations. However, the key element of *communication* is to have a multiway dialogue in order to discuss issues that will resolve questions, concerns, and fears. It was noted earlier that campus carry can engender anxiety among many campus stakeholders who oppose the policy. Similarly, advocates of campus carry often feel they are being targeted for criticism and erroneous conclusions about their motives when they feel they are exercising their constitutional rights. The communication process seeks to ensure that questions are accurately and objectively answered while simultaneously reassuring the concerns of those on both sides of the issue. Consequently, the communication process must be accurate, objective, and, in many instances, personal.

While the policy development and implementation committees were highly interdisciplinary, forum members reported that leadership for the sustained communication effort often became the responsibility of the campus public safety or police department. As such, developing a communication plan and identifying willing

stakeholders from across the campus to participate in the communication plan at times became a role for the public safety executive.[90]

Participants agreed that social media, web-based information, placards, brochures, and signs all have a role in the communication process as well as in the educational process. But most important, the communication plan must address the process for response to questions. Technology has a penultimate role in communication, because the core component in communication is a human response to concerns on both sides of the issue.

Clearly, using social media is a needed and effective way to provide rapid, concise information on virtually any issue. The diffusion—or sharing—of Twitter feeds or Facebook posts can rapidly multiply the consumption of the information on a geometric basis.[91] Consistency of message, substantive facts, and rumor controls are important aspects of social media for information sharing. While there is often some dialogue on an issue through re-Tweets, follow-up posts, and commentary, these are usually short, and there is no moderation. An error can be shared as rapidly as fact. As a result, constant monitoring of social media is needed to ensure the accuracy of information. Consequently, while social media have great value for information sharing, the amount of dialogue is limited and the information can be easily distorted.

For example, to increase input from stakeholders and answer questions, the University of Texas at Dallas policy committee held a town hall that was attended by about 800 persons from the campus community. The committee also created a campus-wide e-mail box for people to provide their views. (The e-mail box remained open after the policy was implemented, and it still receives questions and comments, to which the university provides responses.)

From a public safety perspective, perhaps the most effective means of communication is through community police officers.[92] Officers with substantive information on the campus carry policy, data about crime on campus, and the ability to speak with objectivity and authority on the campus carry issue are an invaluable resource. Meeting with student organizations, as well as residence hall organizations, on a consistent basis keeps an open dialogue to inform and learn about all aspects of campus public safety, not just campus carry.

As noted earlier, empirical research has shown that campus stakeholders who have the greatest concern about campus carry are students and faculty. As such, there

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[90] An executive resource for effective communication can be found at Stephens, D. W., J. Hill, and S. Greenberg. (2011). *Strategic Communications Practices: A Toolkit for Police Executives*, Washington, DC: Major Cities Chiefs Association and the Office of Community Oriented Policing Services. Available at https://ric-zai-inc.com/Publications/cops-p222-pub.pdf.

[91] An interesting study on the distribution and sharing of police Twitter feeds is Van de Velde, B., A. Meijer, and V. Homburg. (2015). "Police Message Diffusion on Twitter: Analyzing the Reach of Social Media Communications." *Behaviour and Information Technology*, *34*(1). http://dx.doi.org/10.1080/0144929X.2014.942754.

[92] Some very good techniques and tools for communication and community engagement can be found in *Community Outreach and Engagement Principles*, Alexandria, VA: International Association of Chiefs of Police, http://www.theiacp.org/portals/0/pdfs/IACP-COT_CommPolicingPrinciples__FINALAug12.pdf.

is value in partnering with these stakeholders in traditional academic activities that will open a dialogue on the issue. These may include:

- *Brown bag lunch discussions.* These are a common topic-driven activity, mostly involving faculty and graduate students, where issues of the day are discussed in an informal setting. Usually conducted in small groups within an academic discipline, these discussions have proved to be effective for identifying critical issues on a topic and providing insights into misconceptions. On the issue of campus carry, they can be good tools to help mitigate fears and reduce rumors.
- *Teach-ins.* Teach-ins are a series of lectures or speeches conducted by faculty members, originally as a technique to address social unrest and issues on campus. They are not credit-based lectures and generally draw in students who have strong emotions about an issue. These permit dialogue in a free-flowing setting led by a faculty member and allow people to express their opinions, concerns, and angst.
- *Special Topics course.* Virtually every academic discipline at colleges and universities will have such a course that can be offered by a faculty member to address contemporary issues in a comprehensive manner. Students can take the class for academic credit that can typically be applied toward electives in their degree program. The course can be offered for variable credit (e.g., typically one to three semester credits) and can provide the opportunity to examine the issue of campus carry in depth, along with the collateral issues of crime on campus and Second Amendment rights.

Partnering with an institution's mass communications department, as well as university communication or public information, institutional branding, and athletic communication offices may also provide resources and expertise to support all communication efforts, particularly to target niche stakeholders. Similarly, developing a campus carry website and smartphone app that can provide information on policies, descriptions and map-based locations of exclusion zones, and handgun safe locations may also be useful tools.

As a final communication issue, many institutions offer an array of special events on campus during the summer months, ranging from youth athletic camps to special programming for retired persons. Not only are the events held at campus facilities, oftentimes participants will stay in the residence halls. As a result, it is a good practice to develop a communication strategy to inform special programming participants on the campus carry policy in association with the program's registration process.

Communication efforts need to be comprehensive, creative, and objective. Institutional communication should take care to ensure that its role is to explain campus carry policies and procedures and not to advocate a position on campus carry. The judgment on the law is not the institution's responsibility; making policy to facilitate the law is its role, and effective communication will facilitate that role.

Culture/Climate

The final factor that forum members stressed was the importance of understanding the culture and climate of the institution. All organizations have a culture—it shapes the attitudes, values, beliefs, and language of organizational members. More so than business and government, the culture in higher education is eclectic, sometimes divisive, with a wide range of tolerance given to diverse viewpoints on virtually any issue. A classic report on institutional culture in academe observed:

> Institutional culture is both a process and a product. As a process, culture shapes, and is shaped by, the ongoing interactions of people on and off campus. As a product, culture reflects interactions among history, traditions, organizational structures, and the behavior of current students, faculty, and staff. Artifacts are observable manifestations of culture, such as the institutional mission statement, architecture, academic program, language, myths, stories, symbols, rites and rituals, and ceremonials. Culture is also revealed through an examination of espoused and enacted values and the core beliefs and assumptions shared by institutional leaders, faculty, students, and other constituents, such as alumni and parents.[93]

This quote reveals the complex formula of variables and relationships in higher education culture that must be addressed in the development and implementation of a new policy. When the policy generates the emotion one finds associated with campus carry, the challenges become more complex.

Culture is not a distinct issue that needs to be separately addressed, but it needs to permeate each of the factors addressed above. Every effort needs to be inclusive, objectively reviewing diverse opinions and making decisions on all aspects of the campus carry policy and its implementation that meet the standards required by the state law in a manner that is as embracing of campus culture as possible. This is a difficult challenge on campus carry because opinions are emotional and are largely at opposite ends of a continuum. Opinions of persons at each end of the continuum are equally valid. The challenge for the institution is to forge a rational policy and pathway to lawful campus carry in an emotional environment.

A final note on culture deals with international students.[94] Many institutions have a substantial body of international students whose life experiences simply will not reflect the same attitudes toward firearms as we have in the United States. Special attention

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[93] Kuh, G. D., and E. J. Whitt. (1988). *The Invisible Tapestry. Culture in American Colleges and Universities*, ASHE-ERIC Higher Education Report No. 1, Washington, DC: Association for the Study of Higher Education, p. 6. Accessible at http://files.eric.ed.gov/fulltext/ED299934.pdf.

[94] Interesting insight on international students' integration into the American academic environment can be found in Glass, C. R., and C. M. Westmont. (2014). "Comparative Effects of Belongingness on the Academic Success and Cross-Cultural Interactions of Domestic and International Students." *International Journal of Intercultural Relations, 38*, 106–119, http://www.sciencedirect.com/science/article/pii/S0147176713000564?np=y.

needs to be directed toward international students to educate them about the constitutional importance of "the right to bear arms" in the United States so they fully understand the debate. It should be emphasized to international students that campus carry is not a cultural dynamic or policy they should fear. Indeed, it should add to their understanding of America.

SUMMARY AND CONCLUSIONS

The passage of state laws for campus carry is another iteration of socio-legal evolution that provides new challenges for public safety on our nation's campuses. Colleges and universities are environments that are accustomed to debate and, in some cases, isolation from the broader social community. As a consequence, there are frequently diverse reactions—either in support of or opposition to—new policies that upset the status quo. Campus carry represents one of those policies. The challenge is to move forward with the policy in an objective, thoughtful manner. Campus carry surely provides challenges, but the barriers are not insurmountable. Several campuses have addressed the issue with thoughtful success and have provided a solid precedent for a campus carry policy that can be developed and implemented to meet the mandates of state empowering laws while at the same time maintaining the objectivity of a reasoned approach in a sometimes challenging environment.

The conscientious public safety executives in this forum provided thoughtful direction, inclusiveness, and a comprehensive approach to a campus carry policy. Their efforts have provided insights into how to develop a policy that is functional while addressing the often divergent concerns found in the culture of higher education. The lessons learned, the creative practices, and the holistic approaches reflected in this report provide a clear pathway to meet the needs of every campus facing this challenge.

The necessary components to developing and implementing a successful campus carry policy have been clearly identified and presented. The lessons learned and critical steps to success have been shown to work and provide guidance to campuses that are just beginning to face this new reality. The challenges are real, yet the processes detailed in this report have been shown to be successful.

Institutions that are facing this obligation of state law have a clear paradigm to follow to show how the policies they develop can be effectively applied, despite often vocal opposition, as indicated in the research. One participant observed:

> Despite what we may personally think about campus carry, it is real. We have to address it in a way that maximizes campus safety, protects the rights of all, and is functional.

APPENDIX A
Forum Participants and Affiliations

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Mr. Lewis Eakins
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Ms. Joycelyn Johnson
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Mr. Steven Kaufman
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Mr. Chris Keary
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Mr. James Lyon
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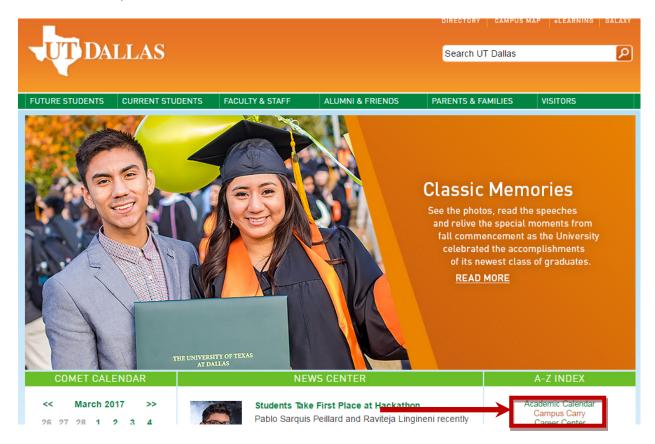 and Explosives
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APPENDIX B
Informing Stakeholders About Campus Carry

Dr. Alex Piquero, who chaired the University of Texas at Dallas (UTD) policy development committee, stated:

> "The campus carry law in Texas required that the University display this on their main page (on [the] main UTD page, the campus carry link is on the right-hand side of the page). This can give future persons who have to develop campus carry policies some examples."

The main UTD web page is at: http://www.utdallas.edu/. The UTD campus carry web page, http://www.utdallas.edu/campuscarry/, serves as a good illustration of a resource that provides a great deal of information. Similarly, the University of Texas at Austin has an informative campus carry web page—https://campuscarry.utexas.edu/.