

NOTICE OF STUDY SESSION
UCPD Police Substation Procedures
CITY HALL, Fifth Floor
6801 Delmar Blvd., University City, Missouri 63130
Monday, February 13, 2023
5:30 p.m.

AGENDA

1. MEETING CALLED TO ORDER

At the Study Session of the City Council of University City held on Monday, February 13, 2023, Mayor Terry Crow, called the meeting to order at 5:30 p.m.

In addition to the Mayor, the following members of Council were present:

Councilmember Stacy Clay
Councilmember Aleta Klein
Councilmember Steven McMahon
Councilmember Jeffrey Hales
Councilmember Bwayne Smotherson

Also in attendance were City Manager, Gregory Rose; City Attorney, John F. Mulligan, Jr., and Chief of Police Larry Hampton.

2. CHANGES TO THE REGULAR AGENDA

None

3. UCPD POLICE SUBSTATION PROCEDURES

Mr. Rose stated he has asked Chief Hampton to provide Council with a presentation on UCPD substation procedures.

Chief Hampton stated this presentation was developed to address some of the requests his department has received to establish substations throughout the community.

Acceptable Definition of a Police Substation

UCPD Substation Procedural Standards: Throughout the 100+ years of the University City Police Department's existence, there have been numerous updates to standardized policing procedures. In more modern times accreditation standards, certification standards, federal and state laws, along with accepted best practices have directed many procedures of law enforcement agencies.

The acceptable definition for a police substation is a police headquarters for a particular district, from which police officers are dispatched and to which persons under arrest are brought.

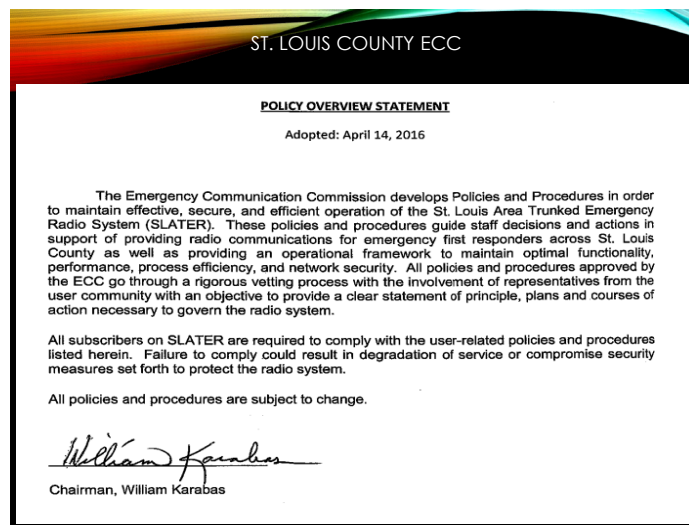
Governing Bodies of Classified Intelligence

- The **CJIS** (Criminal Justice Information Services/FBI) data requirements for CJI in transit, are a minimum of 128-bit encryption, and 256-bit encryption for at-rest data; (stored and remaining in one location).
- Records must be kept confidential, and the risk of unauthorized access to confidential CJI information must be kept at a minimum. **A secure internet connection that is not connected or shared with a business is required.**
- Printed CJI information; whether stationary or transported, must be kept secure in a locked area or container **that is not accessible to unauthorized personnel.**

Any printed or written material containing CJI that needs to be discarded must be disposed of securely via approved accreditation procedures.

- ✦ ***The ECC/Emergency Communication Commission; (a St. Louis County Agency), has loaned multiple items of radio equipment to the UCPD Dispatching Center.***

Chief Hampton stated these are some of the procedures required when vetting vendors. Any broadcasting that occurs at substations falls under the jurisdiction of the ECC, which also requires that certain requirements be adhered to.



ECC Policy Statement

REJIS

REJIS (The Regional Justice Information System), provides its 84 users in Missouri and Illinois with rapid access to large files, as well as equally rapid entries, corrections, or cancellations. Therefore, **REJIS and ECC requirements must conform to the previously mentioned CJIS requirements.** The ECC's stringent requirement is that all communication equipment, including telephones, chargers, and storage of radio handsets or batteries be located in a secure area.

- ✦ ***Each portal that the department has a partnership with must be integrated with all of these systems and is required to obtain their approval prior to implementation.***

Missouri Police Chiefs' Association

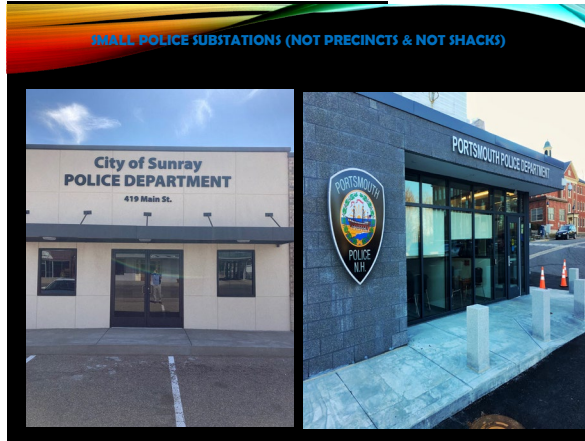
Accreditation requirements for MOPCCA are as follows:

- Any communications center; (radio equipment, chargers, scanners, etc.), must be secure from physical attack and sabotage, have emergency power, have limited access to the area while maintaining accommodations for radio, telephone, and teletype or automated data communications as part of the system.
- ✦ ***Custodial arrests and detention locations require even greater mandated standard procedural requirements for law enforcement agencies.***
- There must be secure firearms storage; duress alarms; escape prevention; authorized access only to the areas; face-to-face visual observation of unattended detainees at least every 30 minutes; use of electronic surveillance devices to monitor detainees between the 30-minute

face-to-face observations, for temporary custody areas or rooms used for processing and/or temporary custody.

- Temporary custody facilities must be specifically identified as such, provide access to water, restrooms, etc.; have a fire prevention, fire evacuation, and fire suppression plan in place; periodic inspection and staff review of the area. They must specify when and where individuals may be restrained by securing them to fixed objects and identification of those objects designed for such use. Males, females, and juveniles **MUST** be kept separated by sight and sound.

Small Police Substations



Although this photo depicts some of the substations that can be found throughout various communities, St. Louis County utilizes districts which are larger than substations.

Poorly Designed Police Substations



Substations that can be described as shacks or holes in the wall typically do not have the capacity to meet many of the requirements previously described.

- ✦ ***The reputation of the UCPD is determined by the standards & behavior of all City Employees.***

Installation Summary for Police Substations

- Accreditation requirements that allow all police substations to be thoroughly inspected and audited by the accreditation body
- Policy and procedural requirements in place by the outside entities that support municipal law enforcement certifications; (i.e., CJIS, REJIS, St. Louis County, ECC, etc.)

- All costs regarding equipment, installation, operations, and maintenance are to be absorbed by the business or stakeholder, and not at the cost of University City
- Separate restroom facilities for the public and staff contained within the substation is a best practice for officer safety and privacy
- Separate phone communication system; as personal data will be discussed with law enforcement staff; (i.e., dispatchers discussing social security, pedigree, and other personal information)
- All Wi-Fi technology connections must be secured and separated from the businesses' normal operations; (no shared networks, servers, or additional technology equipment). All specifications must be dictated by the law enforcement vendors utilized by the UCPD
- Only accessed by UCPD personnel or any surrounding law enforcement agencies willing to participate via an MOU
- CCTV capability is a best practice that only allows UCPD personnel to view outside areas for security
- Any approved UCPD substation shall not be for the primary use of the vendor's personal/physical security purposes. Police, secondary security, or private security would be suggested for those commitments
- The entire community should benefit from an approved police substation
- Use and operational guidelines of any UCPD-approved police substation are governed by UCPD Standard Operational Policies; (General Orders), University City Administrative Regulations, local, state, and federal laws
- Approval of any UCPD police substation(s) must be made by the Mayor and Council

Minimum Required Specs

Any approved UCPD substation should be equipped with all the following:

- A well-designed room with minimum sizing of 26 x 30 dimensions equipped with AV/Network ports for technological setups & a hard-wired telephone
- All network ports inspected and authorized by UCPD IT personnel
- A single-person restroom authorized for law enforcement personnel only
- A separate locking mechanism system programmed for law enforcement use only
- A printer approved by UCPD IT personnel for UCPD personnel to print from their Mobile Data Terminals; (wired capabilities only)
- Three working stations that are dynamically spacious with arm and leg room for large officers; (including chairs)
- Two wall-mounted monitors inside the UCPD substation for CCTV viewing of the parameter
- A secured Shred-It bin for discarded classified documents that will be serviced weekly by UCPD personnel
- A ceiling fan, radio, and body cam charge stations for rebooting, and spacing for additional non-confidential blank paper documents for replenishing

Councilmember Hales posed the following questions to Chief Hampton:

Q. Where was the "acceptable definition" of a police substation derived from?

A. While this does not represent the UCPD's definition, "a police headquarters for a particular district, from which police officers are dispatched and to which persons under arrest are brought," is what his department derived from the research they conducted on smaller infrastructures that encompass functions similar to those performed at a police headquarters.

Q. My understanding is that this presentation stems from discussions about Quik Trip and On-The-Run being designated as police substations. I came up with a list of nine Quik Trips with police substations throughout the City and County, and wonder if you have had any conversations with these neighboring departments about the designations they have allowed Quik Trip to have?

A. More than likely, that substation designation will be eliminated because Quik Trip has become a competitor since they now hire armed security equipped with much of the training and equipment that law enforcement officers possess.

Q. What we're talking about is a practice that has become common throughout the County where these designations are meant to be a deterrent to the non-law-abiding public, and tells the law-abiding public that police are present, are welcome, and they should have a sense of security when using these facilities. So, I don't know what I'm missing here because these exist everywhere.

A. I'm not saying that they don't exist, just that many of these substations may not be in full compliance with the best practices I've described.

Mr. Rose stated staff struggled with finding a definitive definition for substation because some are storefronts and poorly designed, while others are full-fledged stations occupied by trained police personnel. So, what they decided to focus on was what U City wanted to achieve with the use of these facilities; what was important for enhancing the City's public safety efforts and presence in the community.

One thing discussed was report writing. That led them to explore the type of equipment and systems needed to provide this function and is how they landed on the minimal specifications a facility interested in housing a substation would need to ensure that it was a safe and secure space for its officers.

Mr. Rose stated it really hinges on what the City wants to achieve with these facilities. If it's just a place where officers drop in with no ability to perform any of their routine functions, then it probably will have little value as an enhancement to public safety.

Councilmember Hales stated he is just trying to understand where these policies or this proposed policy came from because in practice it does not seem like any of the City's neighbors are following them. And as it relates to accreditation, he was unable to find a reference to substations in the MOPCCA's certification standards.

Chief Hampton stated MOPCCA is not a governing authority, so their standards; which entail the use of communication centers, firearms, etc., only apply to official police departments.

Councilmember Clay stated while he appreciates the research that has been conducted, he is quite familiar with the substations that operate throughout the City of St. Louis which are not set up like what is being proposed, and he would be surprised if they were wildly out of compliance. Councilmember Clay then posed the following questions to Chief Hampton:

Q. Have you or the City Manager talked with public safety directors or police chiefs about how their substations were established and how they use this designation?

A. I have reached out to several of my colleagues; which included the City of St. Louis and determined that the definition of a substation deviated based on what they were trying to accomplish. So, if what the City is aiming for is to take full advantage of these smaller infrastructures by providing a secure zone, then none of their interpretations or applications would be relevant. Years ago, the practice of adding a substation sign to a facility was thought to be a deterrent. But the need for more rigorous oversight of these facilities has caused that way of thinking to evolve. One example is the MetroLink site owned by Wash U, where the lack of oversight led to security cameras being concealed and numerous other problems. And what I'm trying to convey is the need to craft a secure facility to ensure that things like this don't happen.

Q. What I envision when I think of a substation is what I've observed in the City of St. Louis; a sign on the window of a facility that signifies that this is a place where officers can go. And although there might be other tasks they can complete while there, there is no exchange of sensitive information.

A. I also discussed this with the representative from Mobile On-The-Run, who informed me that they have three substations in St. Louis that have been inoperable for several years. Unfortunately, I was unable to gain an understanding of why they had stopped.

Councilmember McMahon stated his definition of a substation was derived from his bosses; the residents, who expressed apprehensions about the new gas station being proposed for their neighborhood and the potential for increased crime. So, the idea was just to have a greater police presence; not necessarily to set up a police headquarters.

He stated that he also did a little research and found a substation created by a partnership between an Indianapolis alliance and their police station that was designed to give officers respite during their shifts; be a place for officers to congregate; perhaps, write reports, but the ultimate goal was to provide a greater police presence. Now, that's a much smaller scope, but it's kind of what he envisioned for U City. So, to Mr. Rose's point, the crafting of a substation really does depend on what you are trying to achieve.

Councilmember McMahon stated this presentation seems to be directing Council toward the creation of a larger structure with lots of components, but he thinks there are lots of things that can be looked at. If you instruct your officers not to dispose of documents at a substation, then you don't need a shredder. If they're instructed not to download or upload documents on their laptops, you don't need a secure connection. His research also revealed that the Sunray facility is their headquarters that was built in 2020, at the cost of \$650,000, and the Portsmouth facility houses their City Hall. So, if the disconnect is between a headquarters versus a substation, then he thinks Council and staff both need to retool their focus and some of these regulations, to craft a facility that is more in line with what his bosses had in mind.

Chief Hampton stated he understands Council's guidance and simply needed to know whether they were talking about apples and apples or apples and oranges. However, based on today's climate, he still has an issue with some of the safety mechanisms like the use of a private versus a public restroom.

Mr. Rose stated he thinks staff has enough information about Council's expectations to determine whether there is a need to identify a definition that captures the uses being described or perhaps, to simply call them something other than a substation.

Mayor Crow stated he's not sure what he's missing because he's frequented The Loop enough to have observed on-duty officers use the public restrooms in various restaurants.

Chief Hampton stated the goal is for officers to utilize restrooms with doors that lock to ensure that they are not putting their safety at risk.

Mayor Crow stated while it is clear that the community has spoken, some things are not so clear. One, he has no knowledge of either of these businesses requesting a substation; the request was made by Council. Two, regardless of what it's called, how much a business will be willing to cover these costs, is yet to be determined. And in his mind, that should be a decision made by Council. So, at the end of the day, he thinks this matter needs to move forward in some sort of context.

Mr. Mulligan stated although at this point, he does not know where the operator is in the construction process, he does recall that during the November 14th meeting there was a Conditional Use Permit (CUP), considered and approved which said that the operator's hours of operation would be from 5 a.m. to 1 a.m. unless a police substation was constructed. And that if it was constructed then the hours of operation could be extended for four hours or until 5 a.m. Therefore, the approval of that CUP meant that the design, particulars, and compliance with those conditions, would be left to the City Manager and his staff to determine.

Councilmember Smotherson stated he certainly appreciates all of this information because it has provided him with better insight into the meaning of a substation and some of the standards that should be considered. Especially given that what the majority of Council thought a substation entailed was a sign on a building indicating that the facility represented a quick spot for officers to hang out and take a break. But personally, what he is looking for is the type of police interaction that provides residents and all of the businesses in this community with a sense of security.

Chief Hampton stated the current vision for his department is not only to improve its staffing levels but to create a business patrol detail. With the Olive Corridor becoming a major business district there are now two districts located on the opposite ends of town. But in its current state, trying to facilitate these district assignments while dealing with all of the other routine calls is not conducive to the type of safety he would like to provide. Chief Hampton stated his preference is to have boots on the ground because in his mind being visible and active helps to deter crime from happening and demonstrates to non-law-abiding individuals that U City is not a soft target. He stated they have employed numerous methods to hire and retain employees so that they can move in the direction of these business details that focus on security and safety for the City's stakeholders.

4. ADJOURNMENT

Mayor Crow thanked Chief Hampton for his presentation and adjourned the Study Session at 6:17 p.m.

LaRette Reese
City Clerk, MRCC

