



CLERY ACT TRAINING SEMINAR

October 14-16, 2025



Our Mission:

Working together with college & university communities to create safer campuses.

Training Presenters:

Cecilia Dockery

assistant director of programs

Paul Hinkle

assistant director of programs

Group Norms

Embrace the Growth Mindset

- Flexibility
- Engagement
- Participation
- Curiosity
- Support



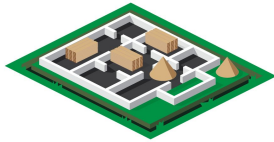
Individual Norms

Put in what you hope to get out

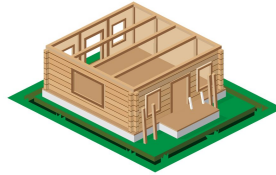
- Be honest with yourself about what you hope to gain from this experience
- Identify your takeaways from this training
- Learning is an active process



Building Skills from the Ground Up



The Why



The ASR



4 W's



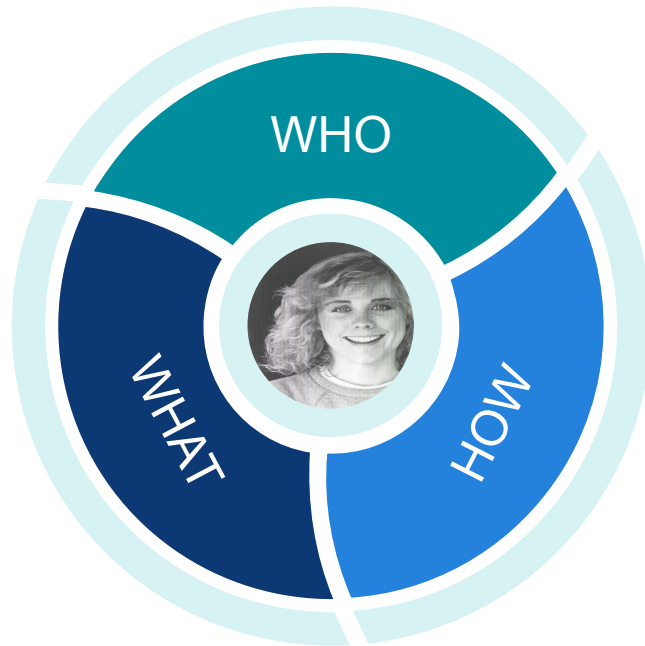
Ongoing Disclosures



Community Education



Finding the Why



7



Our Mission:

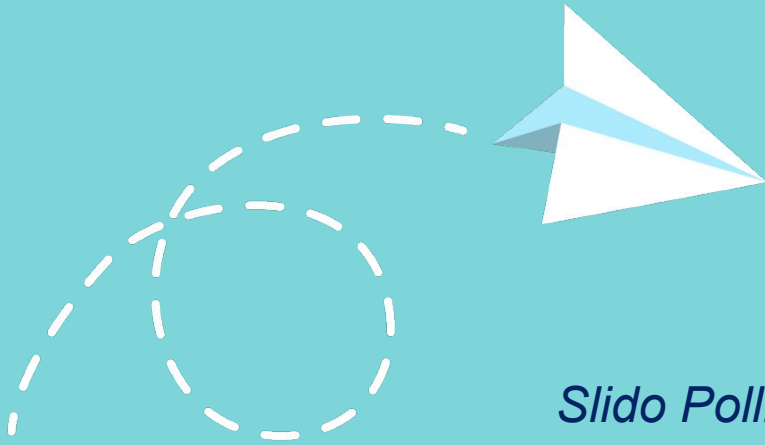
Working together with college & university communities to create safer campuses.

Our Values:

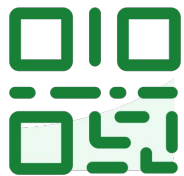
Expertise • Mission-driven
Collaborative • Authentic
Inclusive • Innovative

What We Do:

- Education & Training
- Membership
- Policy Advocacy
- Initiatives: Free topic-specific resources



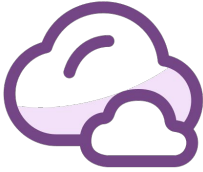
Slido Polling Practice



Join at slido.com
#4290529

*Do not edit
How to change the design*

Do not edit
How to change the design

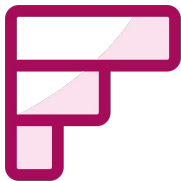


What is one food that you absolutely could not do without?


 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Rank your top 3 favorite streaming services in order.

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



What is the real name of "Shaggy" from Scooby Doo?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Why is campus safety important to you?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Foundations

Understanding the Clery Act

Key Resources

Key Players:

- Department of Education (ED)
Clery Group
 - Fine Per Violation
- Westat
- Department of Education Office
for Civil Rights (OCR)

Resources:

- The Clery Act – Statute and
Regulations
- Clery Act Appendix for
Federal Student Aid (FSA)
Handbook
- ED Program Review Findings
- OCR Guidance

Clery Act Timeline

1988

College and University Security Act (PA)

1990

Crime Awareness and Campus Security Act of 1990 (Title II of Public Law 101-542)

Amended the Higher Education Act of 1965 (HEA) (original Clery Act)

1992

Buckley amendments (FERPA) and Campus Sexual Assault Victims' Bill of Rights amended HEA

17

Clery Act Timeline

1998

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act

2008

HEA is amended by the Higher Education Opportunity Act which amended the Clery Act

2013

Violence Against Women Act Reauthorization Act (Section 304) amended the Clery Act

2024

Stop Campus Hazing Act amended the newly renamed Jeanne Clery Campus Safety Act

18

The Clery Act

- Full Title: Jeanne Clery Campus Safety Act
- Federal **statute** codified at [20 U.S.C. § 1092](#)
- With implementing **regulations** in the U.S. Code of Federal Regulations at [34 C.F.R. 668.46](#)
- **Guidance**: the Clery Act Appendix for the Federal Student Aid Handbook

How has the Clery Act influenced campus safety? How has it helped your institution?

Because of Clery...

- Standardization of campus safety policies and procedures
- Professionalization of emergency and evacuation procedures
- Rights and options for survivors of dating violence, domestic violence, sexual assault, and stalking
- Increased transparency between campuses and community members

21

Clery Act Overview

Who: Campus Security Authorities (CSAs) and local law enforcement

Where: Clery Act geography

What and How:

Annual

- Annual security report (statistics, policy statements)
- Statistics to Department of Education

Ongoing

- Disclosures (timely warnings, emergency notification, daily crime log)
- Rights and options for victims of dating violence, domestic violence, sexual assault, and stalking

Enforcement: U.S. Department of Education (ED) Clery Compliance Group

22

Framing the Annual Security Report



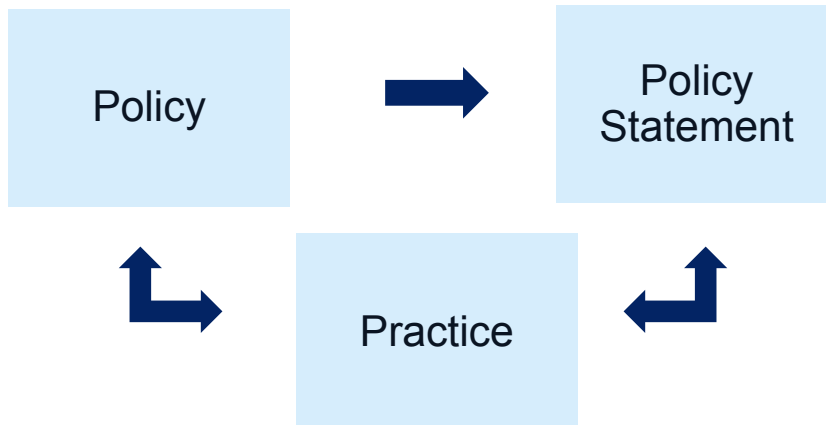
**How familiar are you with
your Annual Security
Report?**

*Do not edit
How to change the design*

Policy Statements

- Annual security report
 - Required statements of policy
- Snapshot of campus safety practices
- “Do what you say; say what you do”

25



26

Topics Addressed in ASR

Policy Statements

1. Compiling the ASR
2. Security of and Access to Campus Facilities
3. Law Enforcement & Jurisdiction
4. Reporting Crimes and Other Emergencies
5. Timely Warnings
6. Emergency Notification and Evacuation Policies
7. Alcohol and Other Drug Policies
8. Hazing Policies and Prevention Programs
9. Dating Violence, Domestic Violence, Sexual Assault, Stalking
10. Student Disciplinary Proceedings
11. Missing Student Notification Procedure

Descriptions

1. Security Awareness Programs
2. Crime Prevention Programs

Statement

Sex Offender Registration

Statistics

Clery Crimes in Clery Geography

27

Before We Move Forward...

- Creation of ASR ensures policies and processes are in place
 - Policy statements and other documents/locations
- Who is at the table?
- Does it reflect our hard work?
- Is it a useful document?

28

Department of Education Finding

Lack of Adequate Policy Statements; Failure to Publish and Distribute ASR

Fast Facts:

Range of gaps, including:

- Nonexistent policies
- Existing policies and procedures but not one central, comprehensive ASR or missing specific policy statements
- ASR with inaccurate information
- Didn't compile complete crime statistics in ASR
- Released after October 1

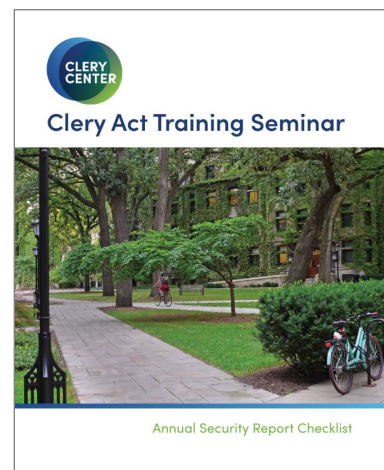
Action Items:

- ASR updates working group
- Reviewed/established required policies and reflected accurate policy statements within updated ASR
- Explanation and correction of crime statistics

29

Using the ASR Checklist

- Tool for institutional review
- Use to document whether or not policy statements exist, take notes, and indicate next steps, responsible parties, and timelines
- Will briefly practice this activity during this session



30

Compiling the ASR

- Description of how the ASR is prepared and purpose
- Who prepares ASR
- How and from what sources crime statistics are collected

Security and Access

- Security of and Access To Campus Facilities
 - Including How:
 - Residences are secured and
 - Students and others access
- Security Considerations in the Maintenance of Campus Facilities

Law Enforcement and Jurisdiction: Overview

- Enforcement Authority and Jurisdiction
- Authority to Arrest and Relationships
- Monitoring & Reporting of Criminal Activity (noncampus locations of student organizations)

Enforcement and Jurisdiction

- Address the enforcement authority and jurisdiction of security personnel

Authority to Arrest and Relationships

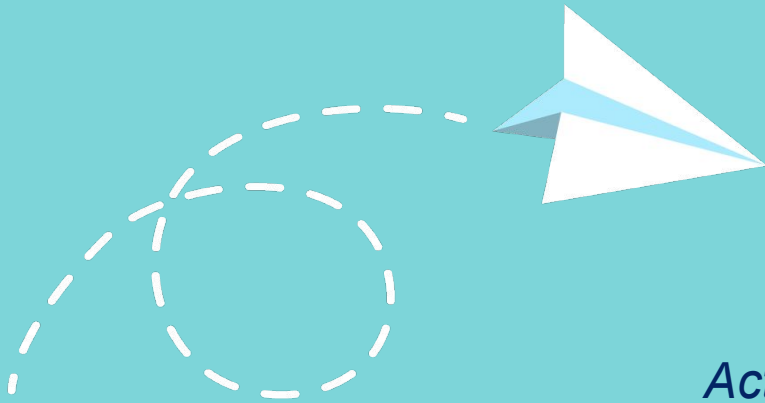
- Be specific and indicate if no authority, limited authority, or who does or doesn't have arrest powers
- Describe the campus security or police department's working relationship with local and state agencies
- Disclose local agreements with law enforcement agencies for investigation of alleged criminal offenses

35

Monitoring and Reporting of Criminal Activity

- Indicate whether/ how the institution monitors the activities of noncampus locations of officially recognized student organizations
 - Not mandated to monitor these activities with local police
 - May monitor these activities with campus police
- If there are no student organizations with noncampus locations, state so in the policy
- If you do not monitor these locations, state this

36



*Activity:
Policy Statement Review*

Practice Using ASR Checklist



- Take a few minutes and look at your institution's annual security report
- Look for the elements under this policy statement:
 - Law enforcement and jurisdiction
 - Security and access to campus facilities
 - Monitoring of noncampus properties
- Complete the ASR checklist with your notes.

Reporting Overview

- Reporting Crimes and Other Emergencies
 - Accurate and Prompt Reporting
 - Reporting of Criminal Offenses
 - Voluntary Confidential Reporting
 - Procedures for Confidential Reporting

39

Accurate and Prompt Reporting

- Policy in place that encourages accurate and prompt reporting of all crimes to campus police and appropriate police agencies **when the victim of a crime elects to or is unable to make such a report**
- If the institution does not have a campus police/security department, this should be stated in the policy

40

Reporting of Criminal Offenses

- Titles of each person/office to whom crimes **should** be reported.
 - Location and phone numbers of each person and/or office on campus
 - The number and office of any off-campus reporting agency
 - Use of emergency blue light telephone or any other reporting system

41

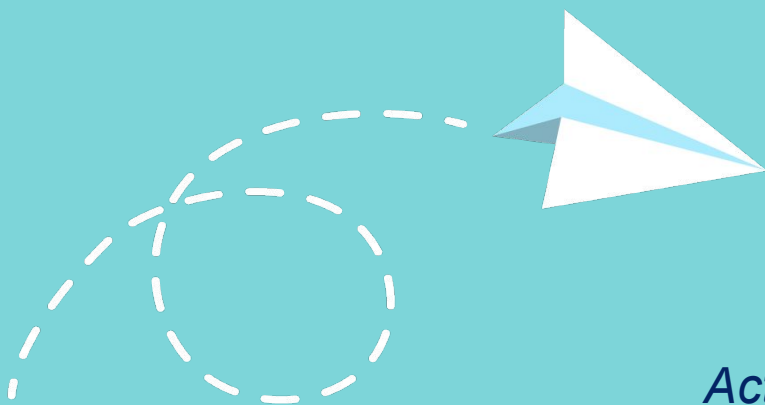
Voluntary Confidential Reporting

- Disclose policies or procedures for reporting crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics; and if so
- Provide a description of those policies and procedures
- If no policies exist, state this in your disclosure

42

Confidential Reporting Procedures

- Procedures encouraging pastoral and professional counselors to inform their clients of voluntary, confidential reporting options
- Institutions are not required to have such procedures in place, but they must be described if they exist



*Activity:
Policy Statement Review*

Practice Using ASR Checklist



- Take a few minutes and look at your institution's annual security report for the elements under this policy statement:
 - Encouraging accurate and prompt reporting
 - Reporting Criminal Offenses
 - Voluntary Confidential reporting
 - Confidential reporting procedures
- Complete the ASR checklist with your notes.

Learning Objectives

- Understand which definitions to use to count Clery Act crimes
- Identify resources for classifying Clery Act crimes
- Practice classifying and counting Clery Act crimes using the Hierarchy Rule

47

Department of Education Finding

Failure to Report Accurate Crime Statistics and Provide Clear Audit Trail; Failure to Properly Classify and Disclose Crime Statistics

Fast Facts:

- Documentation from police department and student conduct office, but documentation from other CSAs insufficient or nonexistent
- Housing reports shredded
- No clear audit trail
- Misclassification of crimes

Action Items:

- For review itself, submitted information to the Department of Education to show incidents were classified properly and included in disclosure
- In some instances, finding was sustained, in others, it was not
- Established documentation systems and revisited application of crime definitions and record retention strategies

48

Clery Act Crimes

Criminal Offenses

- Homicide
- Sex Offenses
- Robbery
- Aggravated Assault
- Burglary
- Motor Vehicle Theft
- Arson

VAWA Offenses

- Dating Violence
- Domestic Violence
- Stalking

Hate Crimes

- Criminal Offenses, plus:
- Larceny-theft
 - Simple Assault
 - Intimidation
 - Destruction, Damage, or Vandalism of Property

Bias categories

- Race
- Gender
- Gender Identity
- Religion
- Sexual Orientation
- Ethnicity
- National Origin
- Disability

Arrests & Disciplinary Referrals

- Weapons Law, Drug Abuse, & Liquor Law Violations

Hazing Incidents

Clery Crime Definitions- Crime Categories

- Open your CCC Guide to the *Crime Categories* section.
- Review the definitions of these crimes briefly on your own.
- We will review considerations of counting for all of these criminal offenses.
 - If you have any questions about the definitions in the guide, stop us as we talk through the counting considerations.

51

Murder & Non-negligent Manslaughter

Count:

- One offense per victim
- Deaths caused by injuries received in a fight, argument, quarrel, or commission of a crime

Do Not Count:

- Suicides
- Fetal deaths
- Traffic fatalities
- Accidental deaths
- Attempted murder
- Justifiable homicide

52

Manslaughter by Negligence

Count:

- One offense per victim

Do Not Count:

- Deaths of persons due to their own negligence
- Accidental deaths not resulting from gross negligence
- Traffic fatalities

53

Sex Offenses

Any sexual act directed against another person without the consent of the victim, including instances where the victim is incapable of giving consent

- Rape
- Fondling
- Incest
- Statutory rape

54

Counting Sex Offenses

Count:

- Victims not offenders
- For statutory rape, count victims that fit your state statutory limit

Note:

While the definitions of sexual assault include lack of consent as an element of the offense, no determination as to whether that element has been met is required.

Robbery

Count:

- One offense for each distinct incident, including attempts
- Carjacking counts as robbery only and not as a motor vehicle theft

Do Not Count:

- Number of victims robbed, offenders, or those present
- If force or threat of force doesn't exist
- If injury results in death - count as homicide

Aggravated Assault

Count:

- The number assaulted as the number of offenses
- Offense per victim - even if injury does not result, if a weapon is used that could have caused serious personal injury

Do Not Count:

- Offenses based on local law classification or policy definitions

57

Burglary

Count:

- One offense for each distinct operation
- One operation per structure
 - The Hotel Rule:
 - Each additional permanent-tenancy space in a structure counts as an additional operation

Do Not Count:

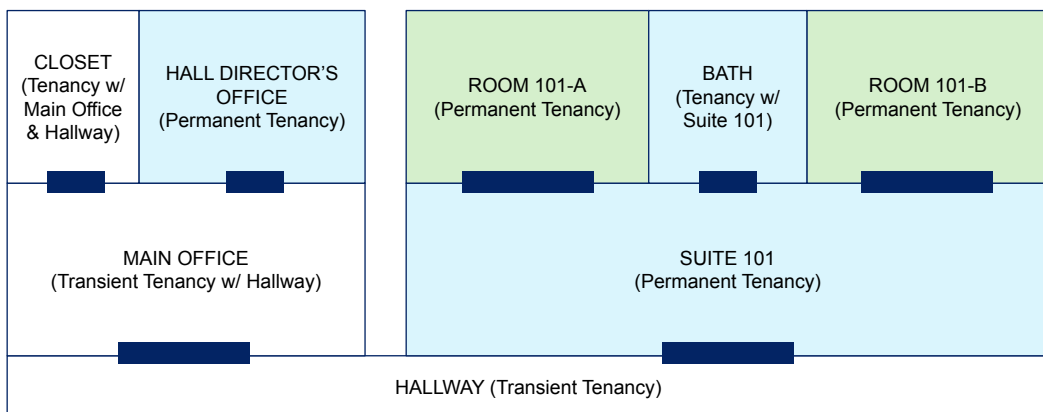
- More than one offense if only transient-tenancy areas were access in a structure.
- Using local law classifications or policy definitions
- Items taken from open access area

58

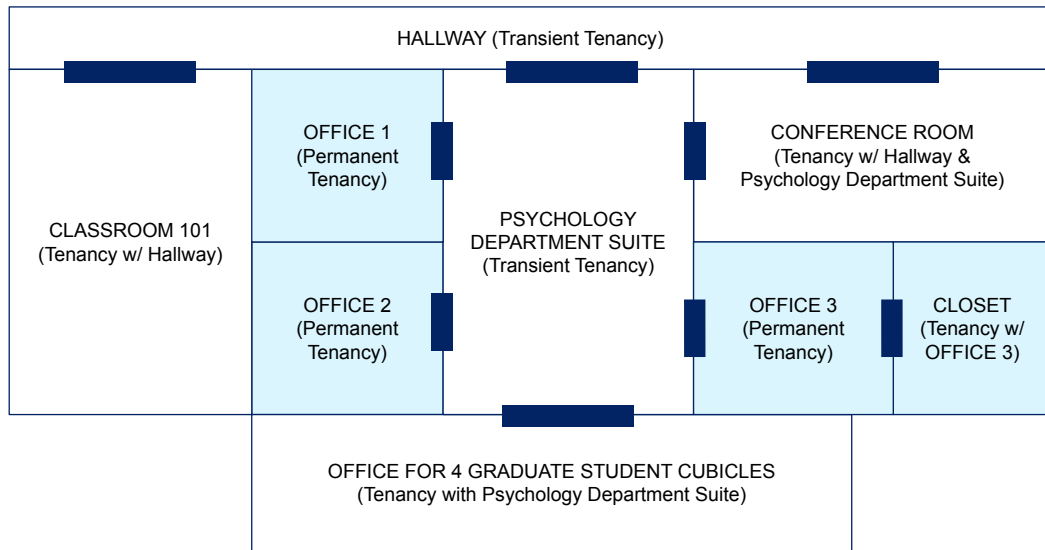
Burglary Review: Implications of Tenancy

- Permanent v. transient tenancy affects counts of burglary
 - 1 count for ALL transient-tenancy spaces
 - 1 count for EACH permanent-tenancy space
- Affects counting in:
 - Residential structures such as multi-student apartments or suites
 - Administrative or Academic buildings
 - Multi-use with both residence and admin spaces

Multiple Tenancy Illustration: Residence Halls



Multiple Tenancy Illustration: Academic Buildings



Motor Vehicle Theft

Count:

- One offense for each stolen vehicle
- Only if taken by a person who doesn't have legal access or owner consent
- Attempts and joyriding, even if the vehicle is recovered

Do Not Count:

- Embezzlement of vehicles
- Thefts from motor vehicles
- Farm equipment, bulldozers, airplanes, construction equipment, sailboats, motorboats, house boats or jet skis

Arson

Count:

- One offense for each distinct incident
- Any fire that an investigation determines meets the definition of arson designated institutional official
- Multiple offenses if in conjunction with arson

Do Not Count:

- If origin is not in the institution's jurisdiction

Attempted Crimes

- Do not differentiate between attempted and completed crimes
- Only exception is attempt to murder where the victim does not die - these should be classified as aggravated assaults rather than homicides

Personal Identification Elements

- Status of victim and/or perpetrator to the institution is irrelevant (ex. student, employee, individual not associated with the institution)

Excluded Crimes

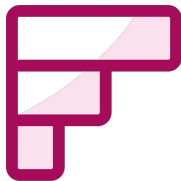
- Non-Clery Act crimes (vandalism, theft, disorderly conduct, drunk driving, etc.)
- Crimes outside Clery geographic area
- Unfounded crimes

Clery Act reporting does not require
initiating an investigation OR
disclosing identifying information
about the victim.

The Hierarchy Rule

- Used for the Criminal Offenses category
- Only most serious offense should be counted
- Used when:
 - Offenses are committed at the same time and place
 - Time interval and distance between offenses is insignificant

69



Rank these crimes how you would assess under the Hierarchy Rule. (Top being most severe)

*Do not edit
How to change the design*

Offense Hierarchy

1. Murder & Non-Negligent Manslaughter
2. Manslaughter by Negligence
3. Sex Offenses
4. Robbery
5. Aggravated Assault
6. Burglary
7. Motor Vehicle Theft

Hierarchy Rule Exceptions

Sexual Assault

- If rape, fondling, incest, or statutory rape occurs in the same incident as a murder, the institution must record both the sex offense and the murder in its statistics

Hierarchy Rule Exceptions

Arson

- Arson is always counted
- Multiple offenses – report most serious along with arson
- Incidents in which persons are killed as a direct result of arson - classified as a homicide and arson

73

Not Included in Hierarchy

Hate Crimes

- Count all crimes motivated by bias, in addition to the applying the hierarchy rule to non-biased crimes

Dating Violence, Domestic Violence & Stalking

- Count in addition to applying the hierarchy rule to the most serious offense

Hazing

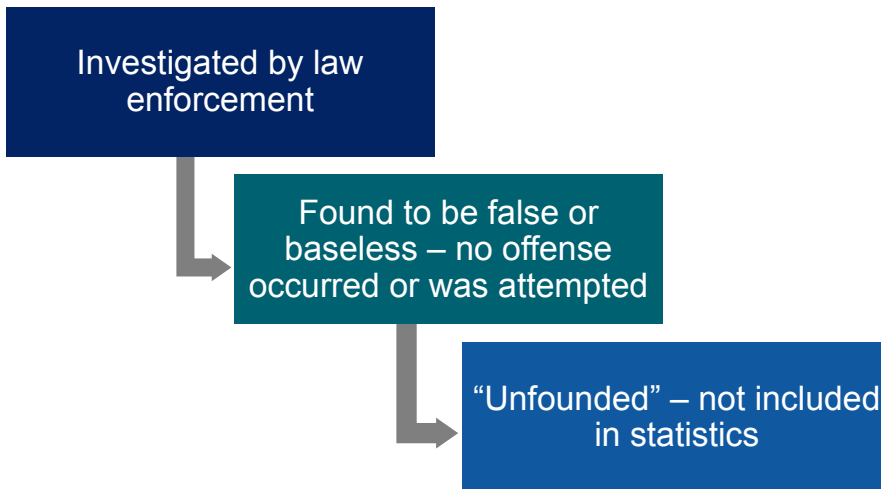
- Count in addition to applying the hierarchy rule to the most serious offense

74

*Remember: the Hierarchy Rule
only applies to reporting your annual
crime stats and not other documents,
such as the daily crime log.*

Institutions must report to the
Department of Education and disclose
in their annual security reports the total number
of crime reports that were “unfounded.”

Unfounded Crimes



77

Do Not Count as Unfounded

- Recovery of stolen property
- Low value of stolen property
- Refusal of victim to cooperate
- Failure to make arrest

78

Recording Statistics: Things to Remember

- Statistics are tied to Clery Act geography
- Hierarchy Rule
- Use Clery crime definitions
- Classify according to the requirements:

Homicide, sex offenses, aggravated assaults, dating violence, domestic violence, stalking	One offense per victim *Special considerations for stalking
Robbery, burglary, hazing	One offense per each distinct operation
Motor vehicle theft	One offense for each stolen vehicle
Arson	One offense for each distinct arson operation

79



Is this a Clery Act crime?

*Do not edit
How to change the design*

Do not edit
How to change the design



Is this a Clery Act crime?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Is this a Clery Act crime?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Which Clery Act crime is this?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Collecting, Classifying & Counting
Hate Crimes

Timeline of Hate Crime Statistics Reporting

1990

Hate Crime Statistics Act requires FBI to report statistics on hate crimes motivated by race, religion, sexual orientation & ethnicity

1994

Violent Crime & Law Enforcement Act adds disability to categories of required hate crime reporting.

2009

Matthew Shepard & James Byrd Jr. Hate Crimes Prevention Act adds FBI reporting requirements on gender & gender identity

85

Intersections of Hate Crime Reporting & Clery

1998

Higher Education Act of 1998 amends Clery Act to require reporting on hate crime statistics for the 7 reportable criminal offenses motivated by bias toward race, religion, gender, disability, ethnicity and sexual orientation

2008

Higher Education Opportunity Act adds four additional crimes to reporting requirements under Clery: • larceny-theft • simple assault • intimidation • destruction, damage, or vandalism or property

2013

Violence Against Women Reauthorization Act adds requirements to report on hate crimes motivated by gender identity, and national origin

86

Hate Crime Categories

Criminal Offenses:

- Murder and Non-negligent manslaughter
- Sex offenses
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Arson

Plus:

- Larceny-theft
- Simple assault
- Intimidation
- Destruction/ damage/ vandalism of property

87

Larceny-theft

The unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another

- Constructive possession is the condition in which a person does not have physical custody or possession, but is in a position to exercise dominion or control over a thing.

(U.S. Department of Justice, FBI. (2004). Uniform crime reporting handbook : UCR.)

88

Simple Assault

An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness

Intimidation

To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack

Destruction, Damage or Vandalism of Property

To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

91

Hate Crimes

Include any of the previous crimes that manifest evidence that the victim was intentionally selected because of the perpetrator's bias.

Bias Categories:

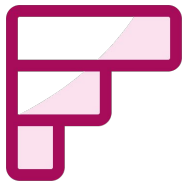
Disability	Ethnicity	Gender	Gender Identity
National Origin	Race	Religion	Sexual Orientation

92

Hate Crime Definitions- Bias Categories

- Open your CCC Guide to the *Hate Crime Bias Categories* section.
- Review the definitions of these categories
 - On the next poll, vote for any definitions that you would like to review as a larger group.
 - You do not have to pick any if you do not wish
- We will review considerations of counting hate crimes together as a large group

93



Which Bias Category definitions would you like to review together?

Do not edit
How to change the design

Hate Crimes

Count:

- If sufficient objective facts are present to conclude that actions in whole or part were motivated by bias
- Offense per victim by geographic location
- All incidents of hate crimes in a multiple offense incident

Do Not Count:

- Unless evidence - knowing perpetrator is prejudiced not enough
- Based on victim's perception
- Rape unless there is clear evidence of bias

95

Determining Bias

- Oral comments, written statements, or gestures
- Drawings, markings, symbols, or graffiti
- Several incidents in same area
- Incident on a holiday or a date of significance
- Previous involvement in a similar hate crime

96

Caveats

- Assess each case separately
- Be alert to misleading facts
- Be alert to feigned facts meant to give false impression of bias
- Offender's mistaken perception that the victim was part of a group

97



Which Clery Act Crime is this?

*Do not edit
How to change the design*



Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Which Clery Act Crime is this?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Which Clery Act Crime is this?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Collecting, Classifying & Counting

VAWA Offenses

Domestic Violence

Felony or misdemeanor crimes of violence committed:

- By a current or former spouse or intimate partner of the victim
- By a person with whom the victim shares a child in common;
- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Considerations

- Count one offense per victim
- Roommates
- State domestic violence laws inclusive of dating violence

Dating Violence

Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of:

- The length of the relationship;
- The type of relationship; and
- The frequency of interaction between the persons involved in the relationship.

Dating Violence

Count:

- Sexual or physical abuse
- The threat of such abuse

Do Not Count:

- Acts covered under the definition of domestic violence

Stalking

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress.

Course of Conduct

Two or more acts, including but not limited to,

- acts in which the stalker directly, indirectly, or through third parties,
- by any action, method, device, or means,
- follows, monitors, observes, surveils, threatens, or communicates to or about a person,
- or interferes with a person's property.

Reasonable Person

A reasonable person under similar circumstances and with similar identities to the victim.

Substantial Emotional Distress

Significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

109

When Classifying Stalking Incidents

Count:

- The first location within Clery geography in which:
 - Perpetrator engaged in the stalking course of conduct
- OR
- Victim first became aware of the stalking

All activities in the course of conduct **do not** need to occur within Clery geography to count the incident

110

When recording reports of stalking that include activities in more than one calendar year, an institution **must record a crime statistic for each and every year in which the course of conduct is reported** to a local police agency or to a campus security authority.

111



Is this a Clery Act crime?

*Do not edit
How to change the design*

Do not edit
How to change the design



Which offense(s) could this incident meet the definition under the Clery Act, depending on the laws in Suzie's state?


 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Is this a Clery Act crime?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Collecting, Classifying & Counting
Arrests And Referrals



Arrests and referrals are counted for state and local law violations, and are not covered by the Hierarchy Rule used to count Criminal Offenses.

Definition of Arrest:
Persons processed by arrest, citation,
or summons

117

Count Arrest if...

- Person is arrested and released without a formal charge
- Juvenile taken into custody but merely warned and released without being charged
- Official action is taken beyond a mere interview or warning

118

If...

- Same person is arrested more than once for multiple separate incidents, count each separate arrest
- Referred for another violation (e.g., arrested for a drug law violation and referred for a liquor law violation) — count only the arrest
- Referred for the same violation (e.g., a drug law violation) — count only the arrest

119

Reporting Arrests for Any Violation

- Use state laws or local ordinances
- Don't use institutional policy
- Count the number of arrests for weapons, drug, and liquor law violations separately
- Count for all required geographic areas
- Do NOT combine arrests and referrals

120

Arrests: Use Discretion

- If there are multiple arrest counts for the same individual within a singular incident, determine which to count and document justification.
- Officer discretion is allowed only for illegal weapons possession, drug, and liquor law violations that occur during the same incident.

Arrests

Do Not Count Arrests if:

- Police contact a juvenile who has committed no offense
- Police take a juvenile into custody for their own protection, but no crime was committed

Definition of “Referred for Disciplinary Action”:
The referral of any person to any campus official who initiates a disciplinary action of which a record is kept and which may result in the imposition of a sanction

123

Elements to Counting Referrals

1. Receiving official must initiate disciplinary action
2. Record must be kept
3. Action may, but doesn't have to, result in a sanction

The results of the disciplinary process (found responsible or not, or accepts a lesser violation) are irrelevant.

It is not necessary that referrals originate with police.

124

Referrals: Other Important Elements

Count:

- Referrals within required geographic areas
- Violations of law (not policy)
- Weapons, drug, and liquor law violations separately

Do not combine statistics for arrests and referrals.

125

How to Count Referrals

Count:

- Number of persons, not violations
- Each referral if same person is referred more than once for multiple **separate** incidents
- Include “mediation” as long as fits definition

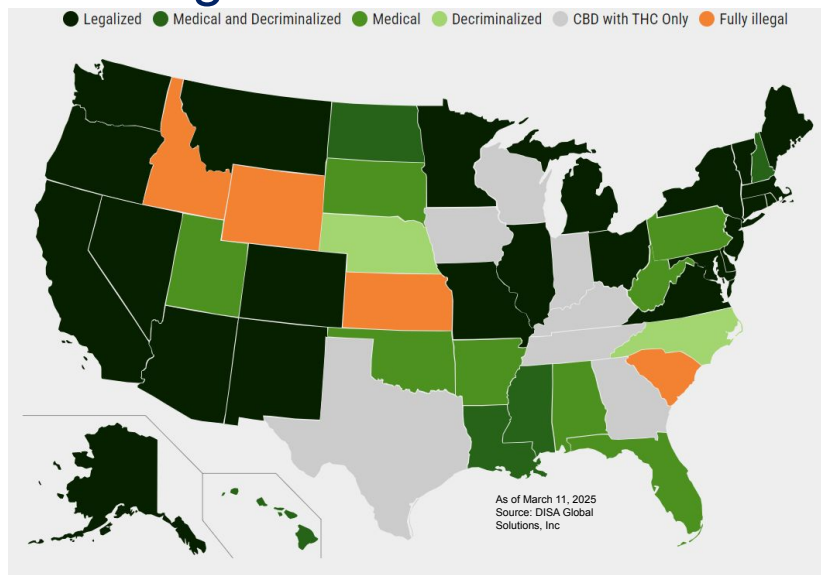
126

Referrals: Use Discretion

- If a person is referred for multiple violations during a single incident, use discretion to determine which violation to count
- Justify and document determination

127

Understanding Cannabis Laws



128

Legal vs. Decriminalized

- Legalization – the removal of all legal prohibitions against it
- Decriminalization – the removal of all criminal sanctions

However, if possession/use of cannabis remains in your state's **criminal** statutes or codes, you should still be counting it for Clery purposes.

129

Figuring Out Your State & Local Laws

- State, County, Municipality Websites
- Talk to your campus Police/Public Safety Department
- Meet with your General Counsel, or whomever your institution retains for legal advice and guidance, & ask about these laws

130

What Questions to Ask?

- What are our state and/or local laws regarding weapons possession, drug abuse, and liquor?
- Do our state and/or local laws consider the body a vessel for possession? Would possession by consumption be a law violation?
- What do our state or local laws say about constructive possession?
 - Given this, how would we count reports of alcohol found in a common space of a 4-person apartment during a housing inspection?

131



Is this a Clery Act Crime?

*Do not edit
How to change the design*

Do not edit
How to change the design



Which Clery Act Crime(s) are present in this incident description?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Is this a Clery Act Crime?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Collecting, Classifying & Counting

Hazing

*Institutions are required to count reports of hazing received as of **January 1, 2025** in their annual statistics.*

Hazing Definition Elements

- Intentional, knowing or reckless act
- Committed by an individual or with others
- Regardless of willingness of victim(s) to participate
- In the course of initiation, affiliation or maintenance of membership in a student organization
- Creates or causes a risk, above a reasonable risk, of physical or psychological injury

137

Examples of Hazing Behaviors in Statute

- Whipping, beating, striking, shocking or placing harmful substances on someone's body, etc.
- Sleep deprivation, exposure to elements, confinement in small spaces, calisthenics, etc.
- Ingestion of food, liquids, alcohol, drugs or other substances
- Causing, coercing or otherwise inducing sexual acts
- Any activity placing someone in reasonable fear of bodily harm through use of threatening words or conduct.
- Any activity against a person that is violation of criminal law
- Any activity that would cause someone to violate criminal law.

138

A student organization is defined as...

- an organization at an institution of higher education (*such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government*)
- in which two or more of the members are students enrolled at the institution of higher education,
- whether or not the organization is established or recognized by the institution.

139

Hazing

Count:

- One count per operation by an individual or group of individuals
- Regardless of disciplinary outcome or finding
- Regardless of if the student organization is officially recognized by the institution

Do Not Count:

- Acts between members of student orgs that aren't in the course of their membership
- Acts of hazing outside of Clery Geography
- Violations of institutional hazing policies that do not meet Clery Act definitions

140

Use the Right Definition

- The statute definition **must** be used to classify & count reports of hazing for your annual statistics

Remember:

Statistics = Statute

- Any institution policy or State-specific hazing definitions should not be used to classify annual statistics

141



Would this incident be counted as hazing in your annual statistics?

*Do not edit
How to change the design*

Do not edit
How to change the design



Would this incident be counted as hazing in your annual statistics?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Would this incident be counted as hazing in your annual statistics?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Would this incident be counted as hazing in your annual statistics?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Would this incident be counted as hazing in your annual statistics?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido



END OF DAY 1

Clery Act Geography

Understanding the 4Ws of Crime Statistics

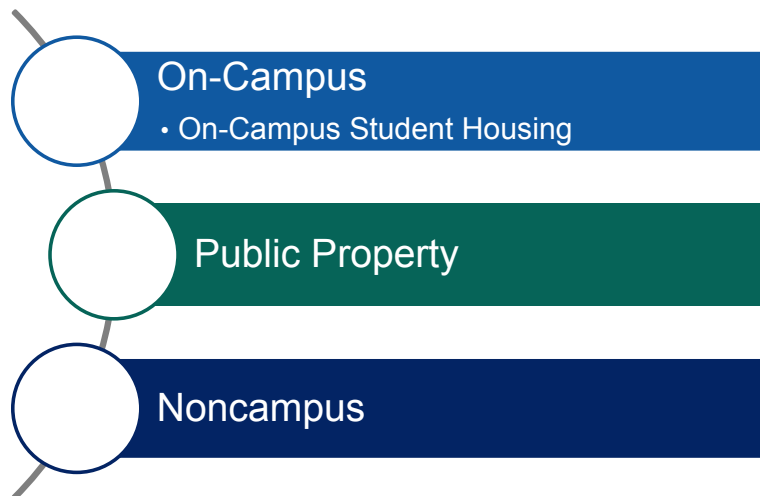
Learning Objectives

- Accurately describe the geographic locations from where crime data is collected
- Evaluate location descriptions to determine whether a location falls within Clery geography

149

Clery Geography

- Accurate picture
- Update annually
- Separate maps/lists for each campus



150

On-campus

What is On-campus?

- Owned or controlled by the institution
- Within the same reasonably contiguous geographic area, and
- Used to meet or support the institution's educational purposes:
 - Residence halls
 - Administrative buildings
 - Buildings that house classrooms/labs
 - Fraternity & sorority houses

Reasonably Contiguous

The Department of Education does not apply any specific or measurable distance definition to “reasonably contiguous geographic area.”

Ex.: Any property included on a campus map or designated by signage as a campus facility is considered to meet “reasonably contiguous geographic area.”

153

Supports or Relates to Educational Purposes Refers to...

The function of the building or property.

For example: Residence halls on campus that house students.

154

On-campus also Includes

Any building or property on campus:

- Owned by the institution but controlled by another person
- Frequently used by students, and
- Used to support institutional purposes:
 - Food vendors
 - Book stores
 - Other retail vendors

155

On-campus Greek Houses

- The building is owned or controlled by the institution
or
- Building is owned by the institution but controlled by the fraternity or sorority
or
- Property (land) is owned by the institution, but building is controlled by the fraternity or sorority

156

On-campus Student Housing Facilities

Student Housing Facilities

In essence, institutions are required to “report” occurrences in student residential facilities **twice** – one for on-campus and one in on-campus student housing facilities.

Student Housing Facilities Include

- Undergraduate, graduate, or married student housing
- Single-family houses used for student housing
- Buildings housing students and faculty, staff, and/or other individuals
- Buildings owned by a third party with written agreement to provide student housing – doesn't matter who pays rent, i.e., institution or student
- Greek houses that are owned or controlled, or are located on property owned or controlled, by the institution in which students reside

159

Each campus, whether main, branch or satellite, **must comply separately with Clery Act** requirements.

Includes U.S.-owned foreign institutions and branches of domestic institutions located abroad.

Includes institutions that **share a campus**, if both are Title IV institutions.

Separate Campuses

According to the Clery Act Appendix:

“An additional location, branch campus, school within the institution, or an administrative location is not within a reasonably contiguous area, such location would be considered a separate campus for reporting purposes.”

161

A Branch

Considered independent if it...

- Is permanent
- Offers programs leading to a degree or other recognized educational credential, and
- Has its own:
 - faculty
 - administrative body (at least one person on site)
 - budgetary and hiring authority

162

School

A division that:

- Offers instruction of a defined type
- Not contiguous to the main campus
- May include:
 - Business
 - Law
 - Medical

Questions to Consider

- Does the location have significant managerial authority and autonomy?
- Are there administrative personnel on site?
- Does the location have significant budgetary and hiring authority?

Public Property

Public Property

- All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.
- No specific measurable distance definition into adjacent public property.

Public Property

- Thoroughfares, streets, sidewalks, bike paths
 - standard practice: “sidewalk, street, sidewalk”
- Public parking facilities
 - on campus or immediately adjacent
 - accessible from the campus
- A public park or waterway
 - if adjacent to and accessible from the campus for the period of time that is accessible
- Public transit stops
 - on campus or immediately adjacent
 - point where rider is required to pay a fare

Incidents that occur on institutionally owned roads or bike paths should be reported under the on-campus category.

NOT Public Property

- Private homes or businesses not owned or controlled
- Privately owned parking facility/lot that borders or runs through the campus
- Area surrounding noncampus property or buildings
- Property separated from campus by man-made barriers or fences
- Fenced in public parks or waterways that are adjacent to and inaccessible from the campus

Noncampus

What is Noncampus?

Any building or property not part of the main campus nor a separate campus and is:

- Owned or controlled by the institution
- Used in support of or in relation to the institution's educational purposes, and
- Frequently used by students

Noncampus Examples

- Research boats/ships/vans or other mobile classrooms
- Space rented or leased for the purpose of offering classes for set periods of time
- Off-campus housing units owned or controlled by the institution

A Noncampus Building or Property May Also Be...

“owned or controlled by a student organization that is officially recognized by the institution such as fraternity and sorority houses”

Noncampus Control Considerations

- Count crimes committed during times institution controls space
 - *Time, dates, space*
- Regardless of whether students are present
- Include common areas
 - *Stairways, hallways, lobbies, etc.*
- Do not include incidents that occurred in a noncampus location outside of the time the institution leases/controls it
- Do not include statistics in a non-controlled portion of a leased building even if the incident involved a student

Noncampus Control Considerations

- Noncampus locations do not have a public property reporting requirement
- A location's geographic identity can shift as the function of that property shifts

175

Other Noncampus Considerations

Likely Include:

- Corporate offices owned/controlled & not on main campus if frequented by students
- Third party agreements that give control
- Locations shared with other institutions if both maintain control over the space

Likely Do Not Include:

- Prisons, military, hospitals without agreements
- Owned by institution but controlled by third party and not frequently used by students or supporting educational purposes
- Student housing recommendations

176

Study Abroad May Be:

Separate

Example:

- Branch Campus

Noncampus

Example:

- Own/control
- Frequently used by students
- Not part of core campus or separate campus

Not Reportable

Example:

- Do not own or control buildings or property

177

School-sponsored Student Trips

Controlled by the Institution

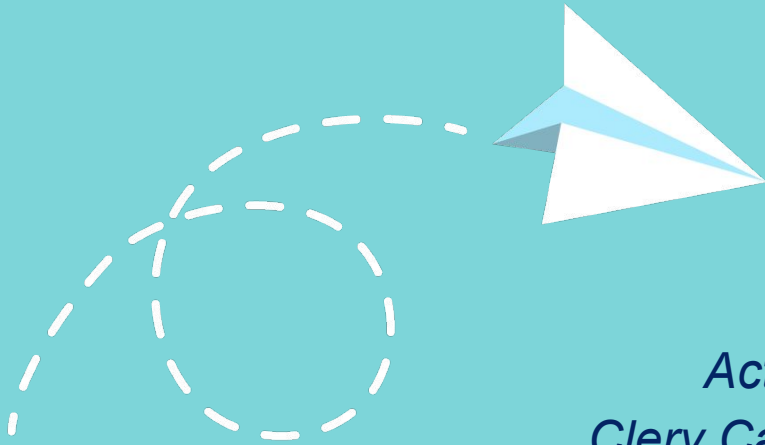
- Agreements must exist for control of space
- Likely consists of:
 - Rental agreements, leases, and/ or use of space or access agreements
- Likely not:
 - Tickets to a place or event
 - Program placements

Frequently Used by Students

Consider definition of “frequently”:

- Term is undefined in regulation, but consider:
 - Are students spending several days in a row at a location?
 - Are students repeating use on a regular basis (quarterly, semesterly, annually?)

178

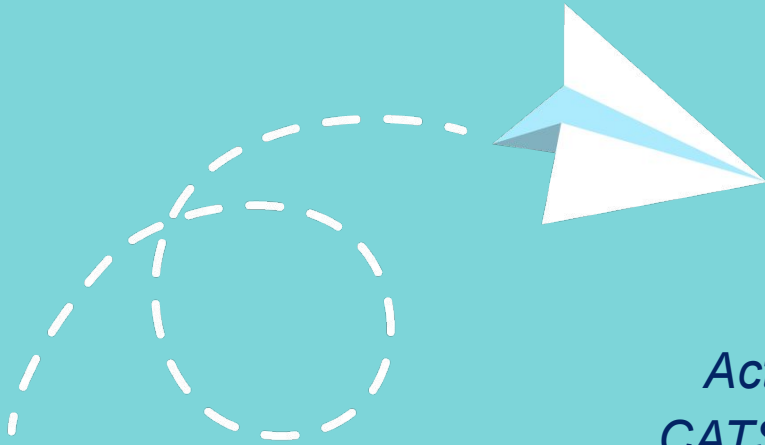


Activity:
Clery Cartography

Clery Cartography

Go to the **Clery Cartography** Workbook activity. There is a fictional campus map on this page for your college.

- Using the numbered buildings as a guide, read through the instructions for Parts 1-4 of the activity.
- Use a different colored writing utensils to complete each part and fill in the corresponding space in the key on the top of the page.
- Process through the questions at the end of the activity with other attendees at your table.



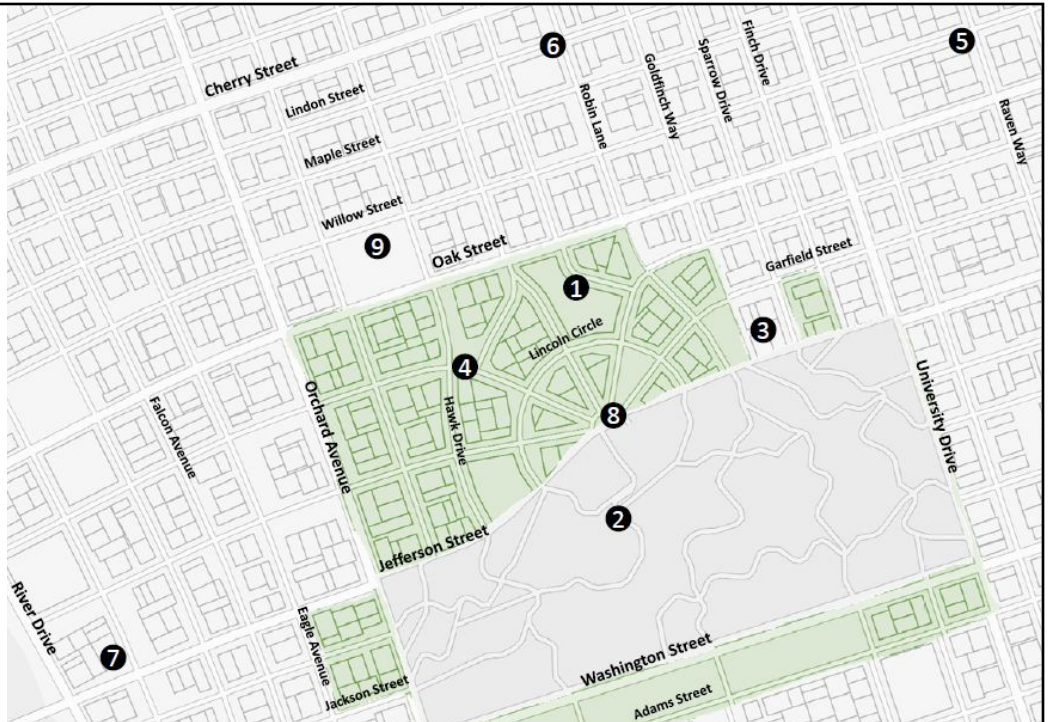
Activity:
CATS Maps

CATS Maps

Go to the **CATS Maps** Workbook activity. There is a map and questions with locations marked with numbers, corresponding to questions on the following pages.

- Using the map as a guide, answer the questions to the best of your group's ability.
- You will have 15 minutes to complete as many questions as possible.

CATS Maps



Department of Education Finding

Failure to Properly Define Campus in Accordance with Federal Regulations;
Failure to Obtain Crime Statistics for Additional Locations

Fast Facts:

- Didn't report for noncampus locations
- No collection of statistics from CSAs at noncampus locations
- No good faith effort to obtain statistics from local law enforcement

Action Steps:

- Identification/list of Clery geography by category (on-campus, on-campus student housing, noncampus, public property, separate campuses)
- Documentation of request to law enforcement and CSAs for statistics
- In some reviews, campus submitted copies of property list and policy and procedures manual to demonstrate compliance – finding not sustained

Collecting, Classifying & Counting

Counting: Combining Crimes and Geography



How would you count this incident under Clery?

*Do not edit
How to change the design*

Do not edit
How to change the design



How would you count this incident under Clery?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



How would you count this incident under Clery?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



How would you count this incident under Clery?


 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



How would you count this incident under Clery?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



How would you count this incident under Clery?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



How would you count this incident under Clery?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Campus Security Authorities

Learning Objectives

- Define campus security authorities under the Clery Act
- Practice identifying CSAs based on their function
- Share strategies for standardizing CSA identification

Campus Security Authorities (CSAs)

- Campus police/security department
- Individuals responsible for security
 - Ex: Access monitors, resident assistants, etc.
- Individuals or offices designated to receive crime reports
- Officials with significant responsibility for student and campus activities

*Person's **function** determines if **CSA**.*

Common Roles to Identify as CSAs

- Dean of students who oversees student housing, a student center, or student extracurricular activities
- Director of athletics, all athletic coaches (including part-time employees and graduate assistants)
- Faculty advisor to a student group
- Student resident advisor or assistant
- Student who monitors access to residence halls or buildings that are owned by recognized student organizations
- Coordinator of Greek affairs
- Title IX Coordinator

10

Who is NOT a Campus Security Authority?

- Faculty without responsibility for student or campus activities outside the classroom
- Support staff
 - Clerical
 - Food service workers

198

Who IS Exempt?

- Pastoral counselors
- Professional counselors
 - Applies to mental health counselors employed or under contract by the institution
- Person uncertified but acting under the supervision of an exempt counselor

199

Other Things to Consider: Designating CSAs

- If your institution directs students or employees to report crimes to other individuals, those individuals are CSAs, including:
 - Physicians in a campus health center
 - Counselors, including peer counselors (except for professional or pastoral counselors)
 - Health educators
- Some roles might not meet the definition of a CSA but also might not be exempt

200

CSA Designation

According to the Clery Act Appendix:

“The Department will defer to an institution’s designation of CSAs as authoritative and provide any technical assistance necessary to work with institutions to help ensure proper identification and notification of CSAs consistent with the regulations.

The regulations do not require that an employee with minimal responsibilities for student and campus activities necessarily be considered CSAs.

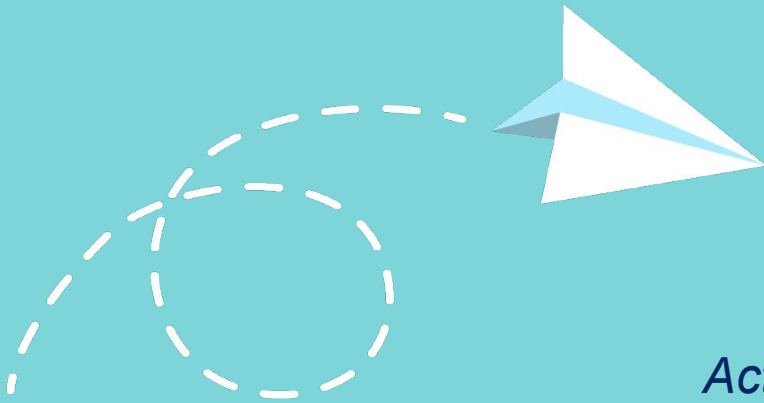
On a case by case basis, institutions may apply the regulations to not designate CSA responsibilities for Clery Act reporting purposes to an individual.”

201

Identification of CSAs

- Designate an individual or office to oversee CSAs
- Engage key collaborators
- Consider function
- Be consistent
- Document process

202



*Activity:
Identifying CSAs*



Ethan is a security guard with a local security company that is contracted by the institution to support security services for the annual spring concert held on campus. Is this person a CSA?

*Do not edit
How to change the design*

Do not edit
How to change the design



Kelsee works in the university IT department as a maintenance technician, fixing broken computers for students and employees. Is this person a CSA?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Dr. Campbell is a licensed psychologist who serves as the chair of the Psychology department of the university. Dr. Campbell also has a private practice off-campus where they meet with clients. Is this person a CSA?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Blake is a Career Coach at the college. Each month they host a networking event where students and alumni volunteer at local nonprofits together. Is this person a CSA?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

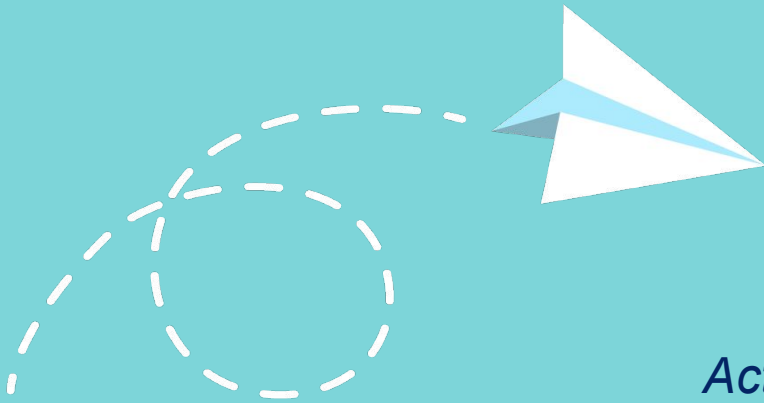
Do not edit
How to change the design



Professor Barnes teaches night classes. Dean Pelton has asked Professor Barnes to "keep an eye" on the student lounge that has had several incidents last year. This arrangement lasts all semester. Is this person a CSA?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido



Activity:
Job Description Decryption

Job Description Analysis

Go to the **Description Decryption** Workbook activity. There are fictional job descriptions for your college.

- You will find 6 job descriptions. As a group, analyze the job descriptions' functional roles and answer the questions provided in the activity.
- You will have 10 minutes to complete this as a group.

A Campus Security Authority's Primary Responsibility is...
to report allegations of Clery Act crimes reported to them to the official or office designated by the institution to collect crime report information.

211

CSA Reporting

- Personally identifiable information (PII) not required but recommended
- Not sharing PII does not equal confidential
- Standardization
 - Forms – helps to eliminate double counting
 - Process – ensures accurate documentation and timely warning assessment

212

When do Crimes Need to be Reported?

- If a victim calls it to your attention
- If a witness or third party calls it to your attention

213

CSAs are NOT Responsible for....

Investigating or reporting incidents

- Overheard from students talking in a hallway or mentioned during an in-class discussion
- A victim mentions during a speech, workshop, or any other form of group presentation
- Learned indirectly

214

More Than Statistics

- Daily crime log
- Timely warnings
- Emergency notification
- Information and support to victims (written explanation of rights and options)

215

Timing/Structure of CSA Reporting

- Build ongoing reporting into your culture
 - Communication & methods of reporting
- “Aggregate data” for Clery purposes
- Distinctions and intersections between Title IX and Clery Act reporting
 - State law considerations

216

Inadequate System for Collecting Crime Statistics

Fast Facts:

- Didn't gather reports in manner likely to result in accurate reporting
- Lack of coordination and communication between offices
- Lack of training (including on proper documentation)

Action Items:

- Established policies and procedures for gathering and compiling incidents of crimes reported to CSAs
- Revised reporting forms and report-writing resources
- Updated method of CSA notification

Training Campus Security Authorities

CSA Training Video

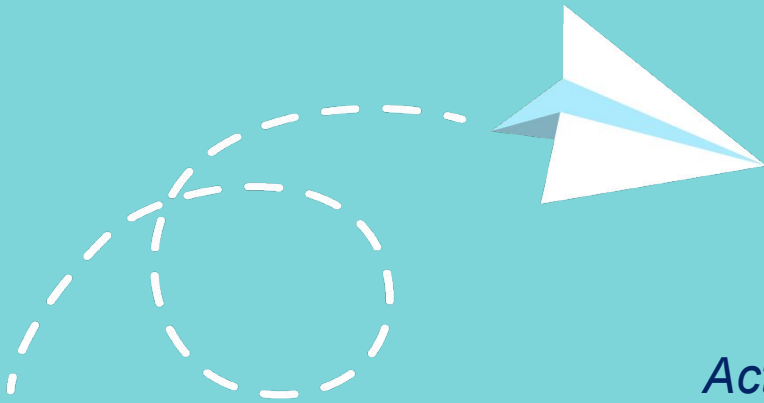
- Important to have formal system for identifying who is required to report (campus security authorities)
- While watching video:
 - Consider what CSAs need to know to meet the requirements
 - Consider tone/strategy for informing CSAs of that role

219



NIKHITH KALKUNTE
Resident Advisor

220



Activity:
3 x 3

Three by Three

Share at your tables:

- What three topic areas are essential components of training CSAs?
- What three things should a CSA do when someone discloses a crime to them?
- What are your top three selling points for why training CSAs is so important?

CSA Training Best Practices

Recommendations:

- Make sure that CSAs know who they are
- Provide job training/description
 - Include information on additional reporting responsibilities (Title IX, child abuse, etc.)
- Give CSAs crime definitions and geographic areas
- Provide reporting materials/forms
- Emphasize the importance of timely reports

223

Best Practices: Needs & Facilitation

Instructional Needs

Mode of instruction may change depending on:

- In-person v. virtual
- Specific audience v. general training
- Standalone training v. inservice days or multi-training workshops

Facilitation

Different trainers can speak to different audiences and concerns

- Is there a specific concern this audience may have?
- Is there someone who has built rapport with this group?
- Is there an issue that needs to be addressed?

224

Best Practices: Schedule & Documentation

Training Schedule

Consider both information retention & staff capacity

- New CSAs
 - One annual training or rolling training when onboarding?
- Returning CSAs
 - How long between refreshers?
 - Do they need a different training than New CSAs?

Documentation

- When the training occurred
- Which CSAs completed the training

225

Embracing Reporting Obligations

BETRAYING TRUST

Reframe
Reluctance

BUILDING TRUST

Support & Resources

- Reporting Options
- Accommodations/Supportive Measures
- Counseling and Wellness support



Ongoing Communication

- Timely Warnings
- Emergency Notification



Crime Statistics

- Annual Security Report
- Daily Crime Log



226

Getting Ready to Train for Hazing Reports

- Review list of CSAs
 - ensure it is up to date and accurate;
 - determine if anyone should be added because they are likely to receive a report of hazing
- More CSAs □ more training needed
 - Consider those who work with student organizations most often (advisors to student groups, residence life, conduct)
- Update reporting forms, training materials, case studies

227

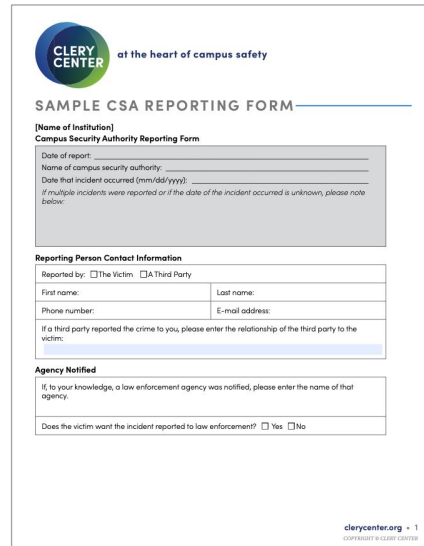
Recommendations: Training CSAs on Hazing

- Update reporting forms to include definition of hazing
 - Consider including potential examples of what would be considered hazing
- Develop a social awareness campaign for CSAs about the new requirements, how to enact them, and who to reach out to with questions
- Partner with student organizations to educate members, recruits and the community about identifying and reporting hazing

228

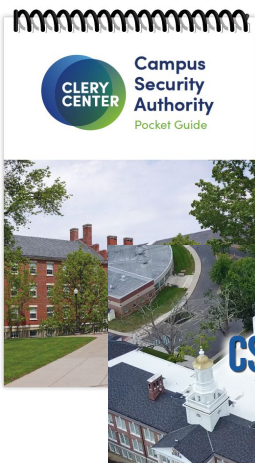
Sample CSA Reporting Form

- Date, time, location of incident
- Location of incident
- Nature of incident
 - Narrative description
 - Crime category
- Identifying information for reporter
- Whether or not other agencies (including those on-campus) have already been informed or notified



The image shows a sample reporting form from the Clery Center. At the top left is the Clery Center logo with the tagline "at the heart of campus safety". The form title is "SAMPLE CSA REPORTING FORM". It includes a section for the institution name and a "Campus Security Authority Reporting Form" section with fields for date of report, name of campus security authority, and date of incident. Below that is a "Reporting Person Contact Information" section with fields for name, phone number, and email address, and a checkbox for whether the reporter is the victim or a third party. The final section is "Agency Notified", with a field for the name of the agency and a checkbox for whether the victim wants the incident reported to law enforcement. The footer includes the website "clerycenter.org" and a copyright notice.

Resource Reminder



Campus Security Authority

Pocket Guide

&

Training Video

clerycenter.org/store

Ongoing Disclosures

Learning Objectives

- Define daily crime log & fire log requirements
- Differentiate between the crime log and statistics reporting requirements
- Articulate the differences between timely warnings and emergency notifications
- Practice developing timely warnings and emergency notifications

What are Ongoing Disclosures?

- How we are communicating to our community on a regular and ongoing basis, regarding crimes in our campus communities.
 - Daily Crime Log
 - Daily Fire Log
 - Timely Warnings
 - Emergency Notifications

Daily Crime Log

Exempt from Crime Log

Institutions:

- Without security or police departments
- With local law enforcement personnel who patrol on or near campus without written agreement or contract
- With individual(s) with limited responsibility for campus security
- With security personnel contracted by landlord

235

Crime Log Reporting Requirements

- Contains all reported crimes
- Recorded within 2 business days of report
- May include wider geographic area
 - On-campus
 - Noncampus buildings or property
 - Public property
 - **Department patrol jurisdiction**

236

Daily Crime Log Overview

- Nature of the crime
- Date/time occurred
- Date/time reported (recorded in order received)
- General location
- Disposition

- Easily Understood
- Must Be Made Public

237

The Nature of the Crime

- UCR definitions not required
- Hierarchy rule doesn't apply
- State crime categories permissible
 - Use easily understood definitions
 - "Simple assault" or "rape"
 - Don't use state penal codes or citation numbers
- Detailed description desirable

238

Time Periods

- Date/Time Offense Occurred
- Date/Time Offense Reported
- Recorded in Order Received

General Location

- Use a meaningful description
- Be specific enough – not generic
- Be careful – do not disclose personally identifiable information

Disposition of the Complaint

Include status (if known)

- Open
- Pending
- Closed
- Disciplinary referral
- Unfounded

Log can only be updated

- Do not delete entries
- Update entries for 60 days after reported

241

Withholding Information

Limited information may be temporarily withheld if release would:

- Jeopardize an ongoing investigation
- Jeopardize the safety of an individual
- Cause a suspect to flee or evade detection
- Result in the destruction of evidence

Update the crime log within 2 business days after these risks of harm are resolved.

242

Making the Log Available

- Hard or electronic copy
- On-site at each campus
- Truly available to the public/media
- Most recent 60 days
- During normal business days/hours
- Portion of log older than 60 days available within two (2) business days of a request

Archived for at least 7 years

243

Sample Daily Crime Log

Nature (Classification)	Date/Time Reported	Date/Time Occurred	General Location	Disposition
Larceny	01/21/25 5:00AM	01/20/25 8:00 AM	Jones Admin. Building	Closed 02/24/2025
Vandalism	01/24/25 12:31 PM	01/17- 01/22/25	Rogers Hall	Closed 02/24/2025
Aggravated Assault	1/24/25 5:37 PM	01/10/25 4:30 PM	Blake Lawn	Open
Liquor Law Violation	01/31/25 3:00 AM	01/31/25 3:00 AM	Dinkley Hall Parking Lot	Disciplinary Referral

244

Daily Crime Log and Annual Stats Differences

Daily Crime Log

- All Crimes
- Patrol jurisdiction may extend beyond Clery Geography
- Crimes added 2 business days after report received
- Added crimes updated for 60 days

Annual Crime Statistics

- Specific Clery Act Crimes
- Limited to Clery Geography
- Crimes reported annually in Annual Security Report
- Updated only when they have been miscounted or misclassified

Fire Log

Fire Log Overview

- Daily reporting requirement
- Applicable only to institutions with on-campus housing facilities
- Reported to any official at the institution

Definition of Fire

Any instance of open flame or other burning in a place not intended to contain the burning or in an uncontrolled manner.

Reportable Fires

Fires occurring in your on-campus student housing facilities that may be:

- Already extinguished
- Discovered while burning
- Fires necessitating a 911 call
- Minor fires, easily extinguishable

Fire Log Requirements

- Date fire reported
- Nature of the fire
- Date and time of fire
- General location of fire

Sample Fire Log

Nature of Fire	Date Reported	Date and Time of Fire	Location
Cigarette thrown in trash can	10/15/2025	10/15/2025 Approximately 5:00pm	Grant Hall Stairwell B
Cooking fire	11/24/2025	11/23/2025 Approximately 7:30pm	Reynolds Hall 2nd floor apartment
Flyer set on fire	12/01/2025	12/01/2025 6:34am	Smith Science Center 2nd floor hallway

251

Maintaining the Fire Log

Entries must be added to fire log:

- Within 2 business days
- Most recent 60 days available for public inspection
- Entries older than 60 days going back 7 years must be made available within 2 business days
- Public access includes media

252

Maintaining the Fire Log

Institutions may decide:

- Who/which department maintains
- Where log is kept
- If electronic or hard copy
- Must be accessible on-site(s)

Combining Fire & Daily Crime Logs

If combined:

- Label to clearly indicate that it is a fire and crime log
- Contains required element of both fire and crime log

Sample Combined Fire & Daily Crime Log

Daily Crime & Fire Log

Nature	Date/Time Reported	Date and Time Occurred	Location	Disposition (For crimes only)
Larceny	01/21/25 5:00AM	01/20/25 8:00 AM	Jones Admin. Building	Closed 02/24/2025
Cigarette thrown in trash can	01/21/2025 5:05pm	01/21/2025 Approximately 5:00pm	Grant Hall Stairwell B	
Vandalism	01/24/25 12:31 PM	01/17- 01/22/25	Rogers Hall	Closed 02/24/2025
Aggravated Assault	1/24/25 5:37 PM	01/10/25 4:30 PM	Blake Lawn	Open

255

Separating Fire & Daily Crime Logs

If separate:

- Fire log records all reported fires, including arson, in on-campus student housing facilities
- The daily crime log records all arsons and attempted arsons in Clery Geography and patrol jurisdiction.

Statistics may be captured in one, the other, or both depending on the nature of the fire.

256

Campus Hazing Transparency Report

Purpose of the Transparency Report

Summarizes findings concerning ***any established or recognized student organization*** found to be in violation of an institution's standards of conduct relating to hazing as defined by the institution in their ***hazing policies***.

The start date for collecting information on hazing incidents & policy violations for the purposes of this disclosure was on
July 1, 2025.

Definitions for the Transparency Report

Student Organization

- An organization at an institution of higher education in which 2 or more of the members are students enrolled at the institution
- Only required for organizations established or officially recognized by the institution

Hazing

- Institutions must develop a policy definition of hazing
- May use Clery statute, State-required, or others

ASR Policy Statement: Hazing Policies

A statement of current policies related to hazing (as defined by the institution) which will need to include:

- A definition of hazing/ standards of prohibited conduct
- How to report hazing
- The investigation process
- Any applicable local, State or Tribal hazing laws

Reminder: *An institution's hazing policy definitions may be different than the Clery Act statute definition*

261

Separate and Distinct

Hazing Transparency Report

- Uses **campus policy** hazing definitions & jurisdiction
- Updated every 6 months
- Only required to report on recognized student orgs
- Gives information on findings of responsibility for violations of hazing conduct standards

Annual Security Report

- Uses **Clery Act statute** hazing definition & Geography
- Published annually
- Both recognized and unrecognized student orgs
- Gives information on reports received by CSAs regardless of outcome

262

Institutions must start publishing their Campus Hazing Transparency Report no later than
December 23, 2025.

Overview of Requirements

- In a ***prominent location*** on the institution's website and includes the following information
 - The Hazing Transparency Report
 - No personally identifiable information
 - Information about the institution's hazing policies
 - A statement about the availability of annual statistics of hazing reports, and link to the ASR
 - Each previously published report for the past 5 years

Requirement: Hazing Transparency Report

Name of student organization

Description of violation

Must include:

- *any abuse or illegal use of alcohol or drugs,*
- *the findings of the institution, and*
- *any sanctions placed on the student organization*

Date incident was alleged to have occurred

Date investigation was initiated

Date investigation ended with finding of hazing violation

Date institution provided notice to organization of outcome

265

Requirement: No Personal Identification

- Cannot contain any personally identifiable information (PII) of **any individual student**, regardless of role
- Must protect PII for:
 - Perpetrators and victims, as well as other parties
 - Requirement for timely warnings and publicly available record-keeping for crimes of DVSAS is only regarding victims
- Recommended Practice: **Start your process carefully**
 - Make sure automated reports name organizations, not individuals. Ensure that violation descriptions are behaviors, not people, to help eliminate identifiers.

266

Requirement: Statement of Hazing Policy

- Information about the institution's policies on hazing (as defined by the institution)
 - Requires development of a hazing definition
 - Describe how to report hazing incidents
 - Describe the process used to investigate hazing
 - Describe all relevant local, State and Tribal laws in the jurisdiction

267

Requirement: Annual Statistics Notice

- Information on the availability of your annual statistics for reports of hazing
- Include a direct link to the Annual Security Report
- Recommended Practice: **Name the differences**
 - The statute states you may include a description of the difference in purpose and between the Transparency Report and ASR statistics
 - Help avoid confusion—include these descriptions

268

Requirement 5 Years of Data

- Required to keep the previous **5 years** of updates accessible on the applicable website.
 - Ex: December 2025- December 2030
- Recommended Practice: ***Align with other Clery data***
 - Clery Act data retention is 3 years after publication of the last ASR it informs (~7 years). This data may inform your ASR.
 - Keeping it on the same deadline will also keep it simple
 - Ex: December 2025- October 1, 2031

269

Publishing With No Violations to Report

- Institutions are not required to publish the Campus Hazing Transparency Report by this deadline if no violations have occurred.
- Recommended Practice: **Build it before you need it**
 - Have a placeholder statement on the website that states there are no current violations.
 - Still has benefits: informs of your hazing policies, how to report hazing, and links to your ASR

270

Updating the Transparency Report

- Twice per year, at minimum.
 - Exception: if no new hazing violations occurred during that period, no update is required
- Recommended Practice: **Update regularly**
 - Update findings as they occur or on a set schedule
 - If no updates on your schedule, include a statement that no new reports were received by that date

271

More Considerations

- Additional information determined to be necessary by the institution or by State law is permitted
 - Ex: all findings of investigations, not just violation; information on current suspended organizations
- Recommended Practice: **Assess additions as a team**
 - Utilize your Clery Team and/or engaged colleagues to determine what is useful for your community.
 - Add useful information, remove unneeded extras

272

Combining with State Reports

Institutions that have State-specific hazing reporting requirements can use the same report if the State-specific report satisfies the requirements outlined in the Clery Act

States with Hazing Reports:
 Georgia, Indiana, Louisiana, New Jersey, Pennsylvania, South Carolina, Texas, Virginia, Washington

(as of 03/2025)

Who Should Be Involved?

Campus partners that could be involved in developing or publishing the transparency report include:

Student Conduct	Fraternity & Sorority Life	Student Orgs & Activities
Campus Recreation & Club Sports	Performing Arts	Athletics Staff
Academic Affairs	R.O.T.C / Corps of Cadets	Title IV and/or Compliance

Action Steps for Development & Assessment

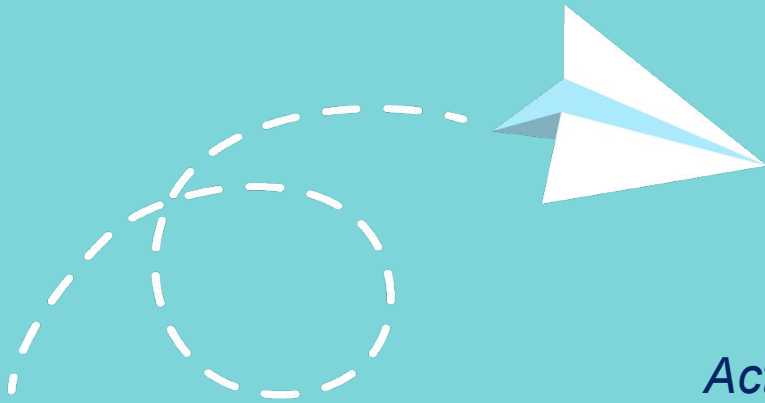
- Review current transparency report and website (if any)
- Determine your colleagues responsible for compiling the transparency report
- Review others' transparency reports and hazing prevention websites (ex: HazingInfo.org)
- Craft a preliminary vision/plan for developing the report (who, how, when, what, where)

275

Clarify for Your Team

- Adds a new report and on a different timeline
- New concept for Clery Act overall – the reporting of outcomes of disciplinary procedures
- Adds a mechanism that doesn't rely on Clery Geography.
- Separate and distinct from the Annual Security Report and does not need to be included within the ASR

276



Activity:
Hazing Mix & Match

Hazing Mix & Match

Hazing Incidents could be documented in up to 3 different places: your Daily Crime Log, your Annual Security Report, and your Hazing Transparency Report

- Open your workbook to the **Hazing Mix & Match** activity and read the short incident descriptions
- Match each incident description to the letter that indicates where the incident must be disclosed
- You may work collaboratively with others

Timely Warnings

Separate and Distinct

Emergency Notifications

- Broader scope – any significant emergency or dangerous situation
- Anywhere on campus
- Entire campus or segment(s)
- Issue alert immediately upon confirmation

Timely Warnings

- Narrower focus – Clery Act crimes
- Clery Act geographic area
- Reach entire campus community
- Issue warning as soon as pertinent info is available

Circumstances Requiring Timely Warnings

- Clery Act crimes (included in annual statistics)
- Reported to a CSA or local law enforcement
- Occurred in Clery geographic areas
 - On-campus (including on-campus student housing)
 - Public property
 - Noncampus
- Represents a serious or continuing threat to **students** or **employees**

281

Exempt Cases

- Crimes Reported to:
 - Pastoral or professional counselor
- Privileged Information Protected by State Law:
 - Medical doctor
 - Attorney/client

282

Timely Warnings Include:

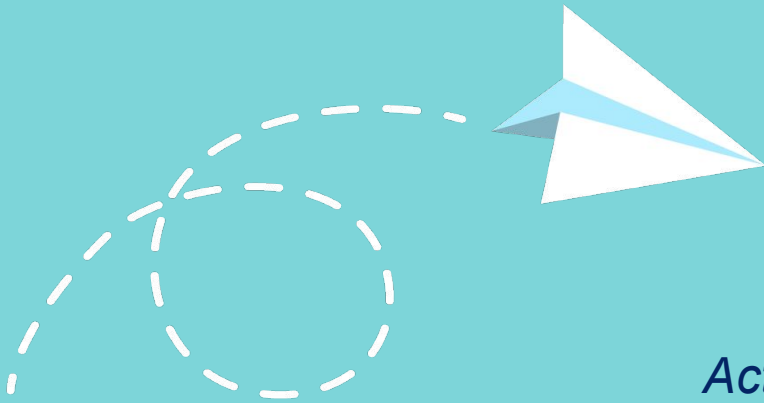
- Information that promotes safety
- Allows individuals to protect themselves
- Time, location, and type of crime

283

Timely Warnings: Confidentiality

- Withhold as confidential the names and other identifying information of victims
 - Required in the institution's dating violence, domestic violence, sexual assault, and stalking policy

284



Activity:
Warning Wordplay

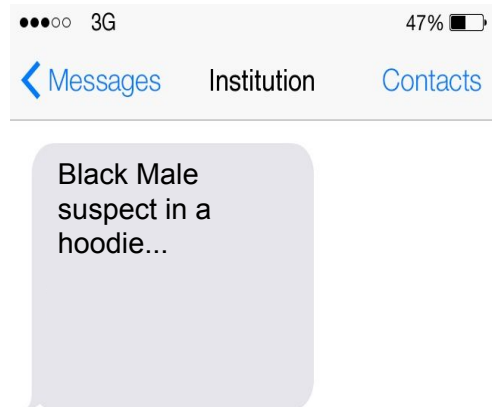
Warning Wordplay

On your table is an envelope labelled “Warning Wordplay”. Inside are laminated strips of paper with phrases that can be used to create timely warnings.

- Open your workbook to the **Warning Wordplay** activity and find your group’s assigned example.
- Use the strips to craft a timely warning you would send to your community.
- Your group will have 15 minutes

Addressing Potential Bias

- Raise awareness around **what** rather than **who** is a “serious” or “ongoing threat.”
- Avoid creating suspect descriptions that create an atmosphere of fear and suspicion, rather than helpful information.



287

Timely Warnings for Hazing

- Hazing reports must be evaluated for timely warnings as a Clery-reportable offense.
- Hazing reports may present ongoing threats.
 - Coercing or forcing others into breaking laws creates downstream victims
 - Forced & coerced sexual acts may present dangers to the community beyond what is initially reported
 - Organizations may not comply or move underground to continue to recruit, haze or retaliate after reports

288

Timely Warning Dissemination Process

- **Must be quick (timely)**
 - As soon as pertinent information is available
- **Community-wide**
 - Likely to reach the entire campus community
- **Aid in the prevention of similar crimes**
- **Specify methods**
 - Text messages, email, social media, posters
 - Other methods and/or combination of methods

289

Decision to Issue a Warning

- **Specify Who Is Responsible**
 - Individual (Title)
 - Department/Office
 - Consultation Process
- **Open Communication**
- **Case-By-Case Basis**

290

Timely Warning Decision-making

- Need for process to evaluate reports and document decisions
- Consistency in Application
- Tool: *Timely Warning Decision Matrix* template in the Workbook

291

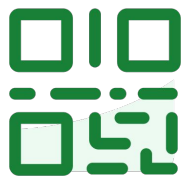
It's Not Easy

- Nature of the analysis – needs/wants of individual versus risk to the community
- Confidentiality and privacy concerns
- Intersecting law enforcement investigations
 - Clery is an **institutional** responsibility, not just a law enforcement/ public safety responsibility
- Sharing specific, relevant information while balancing these concerns

292



*Activity:
Decision-making Case
Studies*



Join at slido.com
#4290529

*Do not edit
How to change the design*

Do not edit
How to change the design



Would you issue a timely warning?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



Would you issue a timely warning?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

There is NOT one specific action appropriate in every circumstance

Institutions should have a decision-making process and document why decisions were made in relation to timely warnings.

297

Considerations from Program Reviews

The documentation of timely warning analysis is important

- Did CSA reports get to the individuals responsible for determining whether a timely warning is necessary?
- Did the appropriate analysis take place in relation to the incident? How soon after it was reported?
- Did the institution follow its own policy for who makes such decisions and methods of dissemination?
- What mitigating or aggravating factors led to the decision of whether it was a serious or ongoing threat?

298



END OF DAY 2

Emergency Notifications

Circumstances Requiring Emergency Notifications

- Confirmation of an emergency or dangerous situation
 - immediate threat to the health or safety of on-campus community members
 - Not limited to Clery crimes

301

Immediate Threats

All Hazards:

- Terrorist attack
- Active shooter
- Natural disaster
- Environmental
- Weather
- Other

302

Emergency Notification Dissemination

- Issued immediately upon confirmation of emergency/dangerous situation
- Can be sent to segments or to entire community
- Include nature of the emergency and changes one needs to make immediately and/or evacuation procedures
- Multi-modal system recommended
- Assurance that adequate follow up information will be sent

303

Withhold an emergency notification ONLY if it compromises efforts to:

Assist a victim

Contain, respond or mitigate the emergency

Determination must be made by responsible authorities identified in the policy statement

304

*If emergency notification is issued,
there is NO NEED to issue a timely warning
for the same circumstance.*




*Activity:
Crafting an Emergency
Notification*

Do not edit
How to change the design



An armed intruder is reported on campus. The caller last spotted them outside of the Roost, a coffee shop located in the Business Center. The individual was walking North toward the university library.

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



An advisory has been issued by the Public Health Authority due to toxic smoke. The smoke can cause severe breathing issues, heart attacks and strokes. The elderly, small children, and individuals with breathing problems are especially at risk.

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

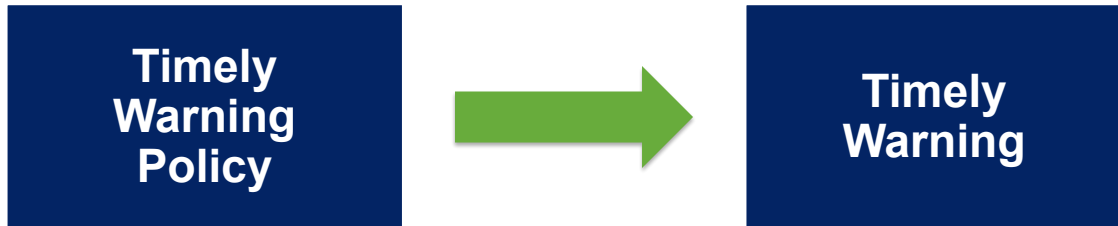
slido

Timely Warnings, Emergency Notifications & Emergency Procedures in the ASR

Alerting/ Ongoing Disclosures Overview

- Hazing Policy
- Timely Warning
- Emergency Notification
- Emergency Procedures and Evacuation

Timely Warning Policy & Warnings



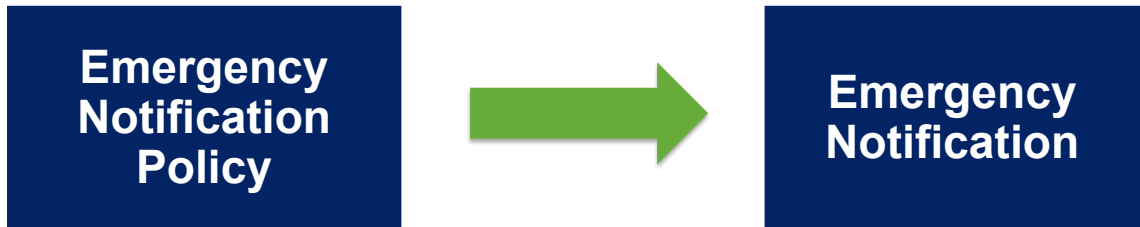
311

Timely Warning Policy Statement Components

- Circumstances regarding issuance
 - At minimum: a Clery crime, reported to a CSA, occurring on Clery Geography, presenting a serious or ongoing threat
 - May be broader in scope
- Individual or office responsible
 - Who makes the determinations? Who sends the alerts?
- Dissemination manner
 - How do we get this information to our community?

312

Emergency Notification Policy and Notifications



313

Emergency Notification Policy Requirements

- Articulate the **process** used to confirm that there is a **significant emergency or dangerous situation** involving an immediate threat to the health or safety of students or employees occurring on campus
- Disclose the **process** used to determine which segment(s) receive notification
- Explain **how** the content of the notification will be developed

314

Emergency Notification Policy Requirements

- Disclose which **officials** by title are responsible for each step
- Initiate notification **without delay and taking into account the safety of the community** unless notification will compromise efforts to assist a victim or contain, respond to, or otherwise mitigate the emergency
- **Procedures** for disseminating emergency information to the larger community

315

Emergency/Evacuation Response Testing Procedures

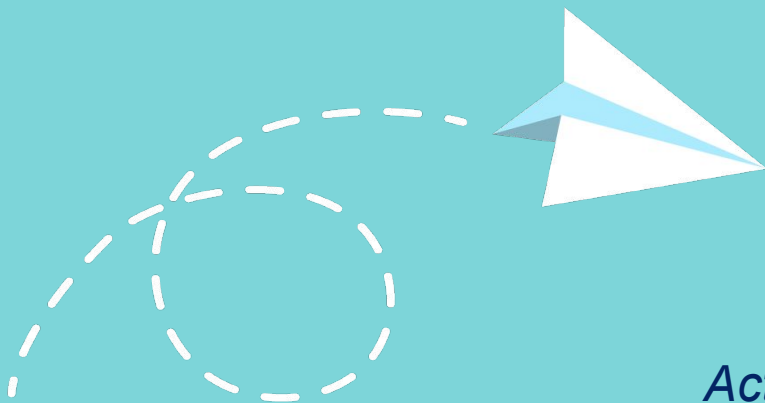
- **Procedures** to annually schedule drills, exercises, and appropriate follow-through activities
 - Whether these tests are announced or unannounced
- **Procedures** to annually publicize emergency response and evacuation in conjunction with a test

316

Documentation of Emergency/ Evacuation Procedures Test

- A **Statement** that the institution keeps documentation for each test, including:
 - A description of the exercise
 - The date and time of the exercise
 - Whether it was announced or unannounced

317



*Activity:
Policy Statement Review*

Practice Using the ASR Checklist



- Look for the elements under these policy statements:
 - Timely Warning
 - Emergency Notifications
 - Emergency Evacuation Procedures
- Complete the ASR checklist with your notes.

Learning Objectives

- Identify and understand required community education programs under the Clery Act
- Establish a process for evaluating compliance of existing programs
- Identify campus partners in prevention

Clery-required Programs



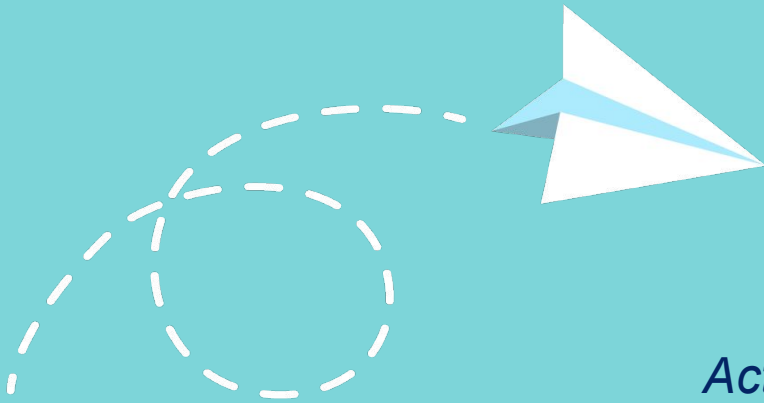
Crime
Prevention
Programs

Security
Awareness
Programs

Substance
Abuse/Misuse
Educational
Programs

Hazing
Prevention
Programs

Programs &
Campaigns on Dating
Violence, Domestic
Violence, Sexual
Assault, & Stalking



Activity: Program Areas

Program Areas

Open your workbook to the **Programs Areas** activity, and find your group's assigned programmatic area.

- For your assigned programmatic area, talk as a group about examples of programs you have either seen, or learned about that you think are positive examples
 - Feel free to brainstorm new programs and ideas as a group as well
- Be prepared to share your list with other groups
- You will have 10 minutes

Program Description: Crime Prevention

- Designed to inform students and employees about the prevention of crime
- Annual security report (ASR) should include:
 - Description of programs (explanation of program, target audience – students, employees, or both, etc.)
 - Disclose if no programs are offered

325

Program Description: Security Awareness

- Designed to inform students and employees about campus security procedures and practices
- Encourage students and employees to be responsible for their own security and others
- ASR should include:
 - Description of programs (type, frequency, target audience – students, employees, both, etc.)
 - Disclose if no programs are offered

326

Program Examples

Crime Prevention

- Personal safety
- Theft prevention
- Campus watch program
- Crime bulletins
- Student/employee safety brochures
- Website postings – crime log, handouts, tips, etc.

Security Awareness

- University 100/101 Classes
- “Don’t Cancel That Class”
- Student organization-specific (like Greek life)
- Theater
- Posters (university reporting, disciplinary process, etc.)
- Training for RAs
- Safe Spring Break

327

Policy Statement: Alcohol and Other Drugs

- Alcohol Policy
 - Possession, Use, and Sale
 - Enforcement of State Underage Laws
- Drug Policy
 - Possession, Use, and Sale
 - Enforcement of State and Federal Laws
- Drug-Free Schools and Communities Act (DFSCA) drug and alcohol abuse prevention program (DAAPP) description or cross-reference

328

Drug-free Schools and Communities Act (DFSCA)

- Section 120 (a) through (d) of the Higher Education Act
 - Annual notification of
 - Drug and alcohol abuse prevention program (DAAPP)
 - To all students and employees
 - Biennial review of the effectiveness of the DAAPP

329

Policy Statement: Drug and Alcohol Abuse Prevention Program (DAAPP)

Clery Act requires description and allows for **cross-reference** to DFSCA materials which include:

1. Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees
2. A list of applicable legal sanctions under federal, state, or local laws for the unlawful possession or distribution of illicit drugs and alcohol
3. A description of the health risks associated with the abuse of alcohol or use of illicit drugs

330

Policy Statement: DAAPP *(cont'd)*

4. A list of drug and alcohol programs (counseling, treatment, rehabilitation, and re-entry) that are available to employees or students
5. A clear statement that the institution of higher education will impose disciplinary sanctions on students and employees for violations of the standards of conduct and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution

331

If not cross-referencing to other materials (DAAPP), each component must be described fully within the ASR itself.

332

Hazing Prevention & Awareness Programs

*Institutions should have had hazing policies for
prevention programs in place by
June 23, 2025.*

Hazing Prevention Programs: Overview

- A description of research-informed prevention and awareness programs designed to reach **students, staff and faculty** which include:
 - Information on current policies related to hazing
 - Primary prevention strategies

335

Policy Statement: Hazing Prevention



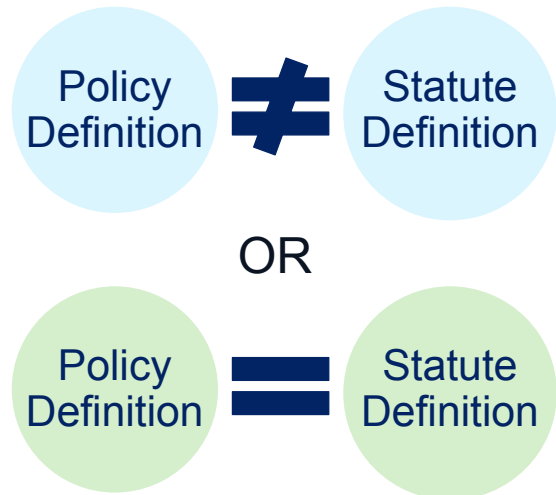
Prevention programs must contain a statement of current institutional policies relating to hazing as defined by the institution, including:

- How to report
- Investigation process
- Applicable local, State and Tribal laws

336

Reminder: Hazing Definitions

An institution is neither required to nor prohibited from using the same definition for its hazing policy as for classifying annual statistics.



337

Policy Statement: Hazing Prevention



Primary prevention strategies intended to stop hazing before hazing occurs, which **may** include

- Skill building for bystander intervention
- Information on ethical leadership
- Promotion of strategies for building group cohesion without hazing

338

Hazing Prevention Programs Policy

Required Components

- College hazing policies
- How to report hazing
- Investigation process
- Applicable laws in your jurisdiction
- Primary prevention strategies intended to stop hazing

Suggested Topics

- Skill building for bystander intervention
- Information on ethical leadership
- Promotion of strategies for building group cohesion without hazing

Hazing Prevention Programs must be research-informed

339

Hazing Prevention Programs

- Programming can look different on every campus.
- Programming should be customized and tailored to your unique campus culture and audience, and evaluated.
- Programming must be research-informed at a minimum.

“Research-informed” means: based on the best available research or evidence.

340

Level of Research or Evidence Associated with Programs

- Evidence-based (gold standard)
 - Research-based
 - **Research-informed** (law language) / evidence-informed
 - Developing evidence
 - Grounded in research

341

Program Examples

- Workshops and trainings with focus on:
 - Bystander intervention training
 - Ethical leadership skill building
 - Building healthy groups & teams
- Social norms campaigns
- Online course/modules (evaluated)

342

Bystander Intervention for Hazing

- Institutional policy on hazing
- Recognizing hazing behaviors
 - Warning signs of hazing
- Options for intervention
 - Direct or Indirect
- Reporting mechanisms
 - What happens after a report

343



DON'T WAIT | ACT NOW

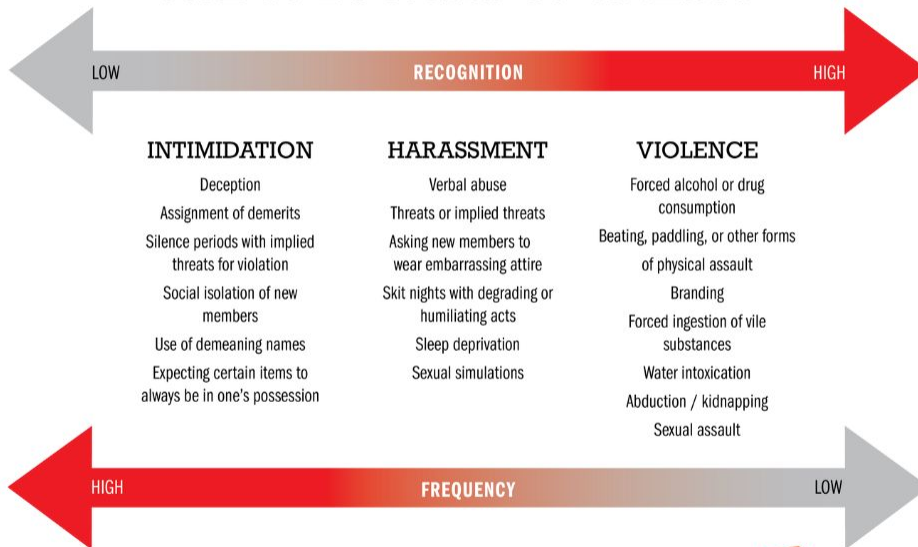


FIVE STEPS FOR SAFE AND EFFECTIVE BYSTANDER INTERVENTION



344

THE SPECTRUM OF HAZING™



(Allan, 2005; Allan & Kerschner, 2020; Adapted from Bringing in the Bystander®)



345

Ethical Leadership

- Principles of ethical leadership
- Ethical decision making
- Understanding group dynamics
- Upholding integrity and accountability

346

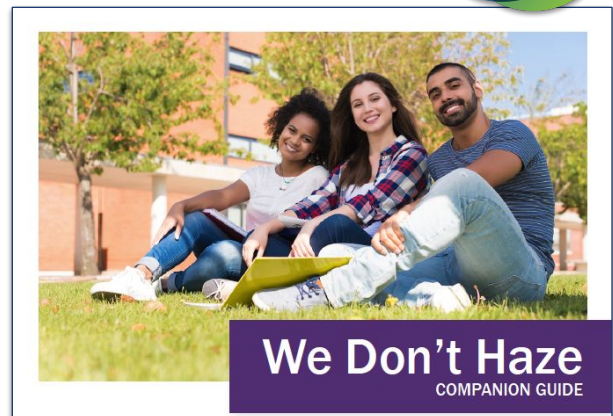
Group Cohesion Without Hazing

- Identifying activities that can become hazing
- Identifying alternatives to hazing that still:
 - Create a sense of belonging
 - Build awareness of group history and tradition
 - Build trust and respect
- Activities to identify group values

347

We Don't Haze

- 16min film
- Identifying hazing, alternative traditions and activities, bystander intervention
- Companion resources
- Tested and evaluated for efficacy



348

Planning Your Programs

- Create and assess specific learning outcomes
- Tailor the mode and delivery based on needs
 - Audience
 - Location
 - Time
- Collect and review evaluation data to improve
- Principles of prevention science

349

Other Supplemental Program Strategies

- Involve your key communities
- Presentations, keynotes, film viewings
- Tabling and information sharing
- Communications campaigns

350

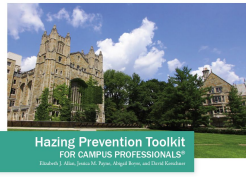
Hazing Education & Prevention Resources



WE DON'T HAZE

“We Don’t Haze” Short Film & Companion Guide

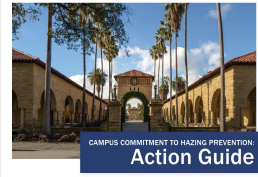
- Features those impacted by hazing
- Guide updated in 2022, includes activities and workshops



Hazing Prevention Toolkit FOR CAMPUS PROFESSIONALS®

Hazing Prevention Toolkit for Campus Professionals

- Introduces Hazing Prevention Framework®
- Action steps for campus-wide buy-in



CAMPUS COMMITMENT TO HAZING PREVENTION: Action Guide

Campus Commitment to Hazing Prevention Action Guide

- Practical resources to engage campus leaders and communities

clerycenter.org/hazing

Programs & Campaigns to Prevent DVSAAS

Dating Violence, Domestic Violence, Sexual Assault, & Stalking (DVSAS) Programs

- Primary prevention and awareness programs for **all incoming students and new employees**
- Ongoing prevention and awareness campaigns for **students and employees**

353

Primary Prevention and Awareness

Primary Prevention

- Informed by research or assessed for value, effectiveness, or outcome
- Intended to stop violence before it occurs
- Changing social norms & stereotypes
- Promotion of positive & healthy behaviors

Awareness

- Increase audience knowledge about crimes
- Share information and resources to prevent violence, promote safety, and reduce perpetration

354

Prevention Programs and Awareness Campaigns Intended to End DVSAAS

- Comprehensive, intentional, integrated and sustainable
- Culturally Relevant and responsive to community needs
- Inclusive of diverse communities and identities
 - Examples: individuals with disability, minority students, LGBTQ+
- Consider environmental risk and protective factors on individual, relationship, institutional, community, and societal levels

355

Awareness Campaign Examples

- Communication strategies (social media posts, email blasts, notices on bulletin boards, posters, and/or radio and newspaper advertisements)
- Programs (Take Back the Night, Safe Walk, promotional materials for programs)
- Programming coordinated with and delivered to individual groups on campus (presentations or workshops for individual sports teams, fraternities and sororities, or residence halls)
- Tables/Booths at campus events
- Classroom discussions (issues, available services) or advertisements for programs and events

356

ASR Requirement: A statement of policy regarding the institution's programs to prevent DV/SAS



357

Programs to Prevent: Overview

- Primary prevention and awareness programs for all incoming students and new employees
 - Statement that the institution prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking as defined under Clery
 - Definition of dating violence, domestic violence, sexual assault, stalking and consent in reference to sexual activity in the applicable jurisdiction
 - Description of safe and positive options for bystander intervention
 - Information on risk reduction
 - Procedures for response and disciplinary process
- Ongoing prevention and awareness campaigns

358

Policy Statement: Programs to Prevent



Statement that the institution prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking as defined under Clery

359

Policy Statement: Programs to Prevent



Definition in the applicable jurisdiction of dating violence, domestic violence, sexual assault, and stalking and consent regarding sexual activity

360

Different Definitions for Different Requirements

What Clery Requirement	Which Definition	Why
Annual statistics reporting	Clery Act definitions of sexual assault (includes rape, fondling, incest, and statutory rape), dating violence, domestic violence, stalking	Consistent definitions across institutions
Disciplinary procedures for resolution of DVSA	Clery Act definitions of sexual assault dating violence, domestic violence, stalking	Base definitions requiring response by all institutions
DVSA prevention programming policy	Jurisdiction definitions for dating violence, domestic violence, sexual assault, stalking, and consent (in reference to sexual activity)	Educate community on criminal code vs. campus policy

Policy Statement: Programs to Prevent

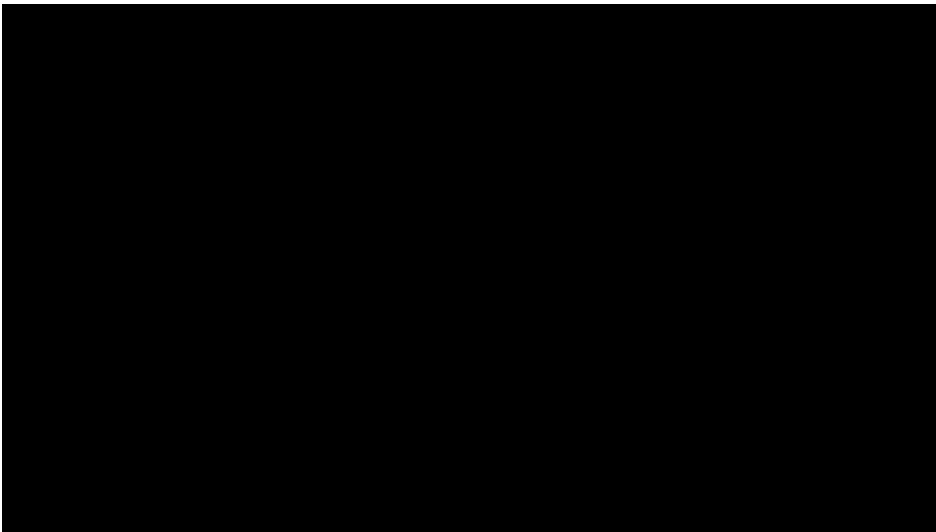


Description of safe and positive options for bystander intervention

Bystander Intervention

- Safe and positive options to prevent harm or intervene including:
 - Recognizing situations of potential harm
 - Understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene

363



It's On Us. (2017, March 28). *Autocorrect* [Video File]. Retrieved from <https://www.youtube.com/watch?v=qk6aauThmW8>

364

Policy Statement: Programs to Prevent



Information on risk reduction

365

Risk Reduction

- Options designed to:
 - Decrease perpetration and bystander inaction
 - Increase empowerment for victims in order to promote safety and help individuals and communities address conditions that facilitate violence

366



Not risk reduction under Clery

- Puts onus on potential victim, while also using victim-blaming language

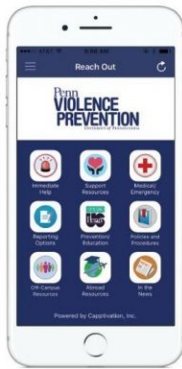
367



Risk reduction under Clery

- Decrease perpetration

368



WANT QUICK ACCESS TO INFORMATION ABOUT SEXUAL ASSAULT POLICIES, RESOURCES, AND PROGRAMS?

DOWNLOAD THE REACH OUT APP.



- Search "Reach Out Editions" in the app store
- Select "University of Pennsylvania" as your school



Risk reduction under Clery

- Empowerment for victims
- Addressing bystander barriers

Risk Reduction under Clery

Help individuals and communities address conditions that facilitate violence.

Having a conversation about problematic sexual behavior can be difficult.

whether you are telling someone they hurt you, talking to a peer about why their behavior is problematic, or learning that you yourself have crossed a line...

remember to:



breathe

Your body might start to feel panicky. That's ok. Take deep breaths.



listen

Try to understand what the other person really means. Don't interrupt and don't assume.



think

This is serious, and it is natural to want to respond immediately. Take the time to digest what you just heard before responding.

nsvrc

"Breathe, Listen, Think",
National Sexual Violence
Resource Center
https://www.nsvrc.org/sites/default/files/2023-12/breathe_listen_think.pdf

Policy Statement: Programs to Prevent



Procedures for response and disciplinary process

371

National Calendar

January

- National Stalking Awareness Month

February

- National Dating Violence Awareness Month

April

- National Victims' Rights Week
- National Child Abuse Month
- National Sexual Assault Awareness Month

August

- National Night Out

September

- National Campus Safety Awareness Month

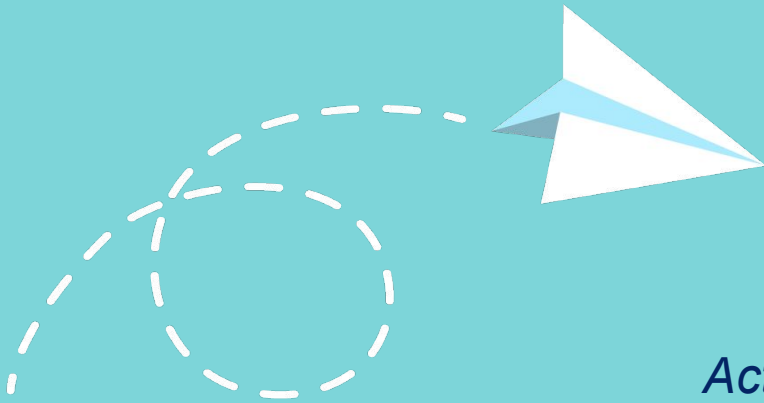
October

- National Domestic Violence Month
- National Alcohol Awareness Month
- National Crime Prevention Month

December

- World AIDS Day

372



Activity:
Policy Statement Review

Practice Using ASR Checklist

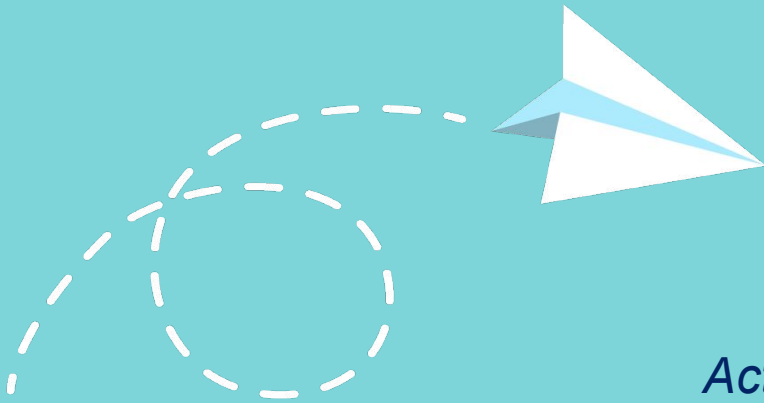


- Review your ASR for information on your
 - Prevention and Awareness Programs
 - Drug and Alcohol Abuse Prevention Programs
 - Prevention for crimes of Dating Violence, Domestic Violence, Sexual Assault and Stalking
- Complete the ASR checklist with your notes.

Intersections

Learning Objectives

- Recognize the intersections between Title IX, the Clery Act, and the VAWA Amendments to Clery.
- Identify Clery Act requirements for response to and disciplinary procedures for incidents of dating violence, domestic violence, sexual assault, and stalking (DVSAS).
- Evaluate policy statements for response to DVSAS to identify required content areas under the Clery Act.



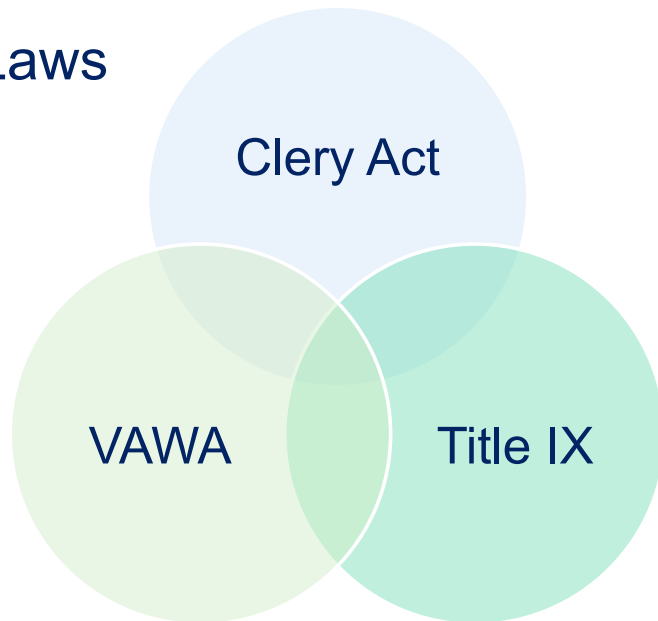
Activity:
Clery/Title IX Intersections

Clery/Title IX Intersections

Open your workbook to the **Clery/Title IX Intersections** activity. At your table, you will have 10 minutes work through the 3 questions provided.

- You may find it helpful to interact with individuals from other departments and functional areas.
 - Feel free to consult with nearby tables to get input from others.
- Be prepared to share your answers with the other groups.

Intersections of Laws



379

Intersections Overview

- Addressed Behaviors and Crimes
- Reporting Requirements
- Accommodations and Supportive Measures
- Disciplinary/ Grievance Procedures
- Training for Employees
- Anti-retaliation Responsibilities

380

Addressed Behaviors and Crimes

The Clery Act

- Criminal Offenses
 - **Sexual Assault**
- Hate Crimes
- Arrests & Referrals
- Hazing
- VAWA Crimes
 - **Dating Violence**
 - **Domestic Violence**
 - **Stalking**

Title IX

- Discrimination on the basis of Sex
- Sex-based Harassment
 - Quid Pro Quo
 - Hostile Environment
 - **Sexual Assault, Dating Violence, Domestic Violence & Stalking**

381

Title IX: Quid Pro Quo Harassment

An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct

382

Title IX: Hostile Environment Harassment

Unwelcome conduct determined by a reasonable person to be so **severe, pervasive, and objectively offensive** that it effectively denies a person equal access to the recipient's education program or activity;

383

Title IX: Crimes of DVSAS

- Sexual assault as defined in **the Clery Act**
 - includes: rape, incest, statutory rape, and fondling
- dating violence, domestic violence and stalking as defined in the **Violence Against Women Act**
 - same definitions as applied under the Clery Act

384

Clery Geography vs. Title IX Application

The Clery Act

- **Geography**, broken down into 4 categories:
 - On-campus
 - On-campus student housing
 - Noncampus
 - Public property
- Expands to “on and off campus” for response to DVSAS

Title IX

- **Educational programs and activities**
- Substantial control of respondent and context
 - May be on or off campus
- Includes properties owned or controlled by recognized student organizations
- Must be in the United States

385

After a report of DVSAS:
The Clery Act *requires institutions to provide a written notice of rights and options to students and employees “regardless of whether the offense occurred on or off campus”.*

386

Identity of Involved Parties

The Clery Act

- Any individual within an institution's Clery Act Geography
 - Regardless of their relationship to the institution

Title IX

- Requires a relationship to the institution.
 - Both parties must be participating or attempting to participate in an educational program or activity
 - *Ex: students, faculty, staff, other employees, or third-party contractors.*

387

Reporting

The Clery Act

- Brought to the attention of:
 - Campus Law Enforcement/ Security
 - Local Law Enforcement
 - Campus Security Authority
- May come from:
 - Victim, Witness, Offender, or Third Party

Title IX

- Requires **Actual Knowledge**
- Individuals who create Actual Knowledge include:
 - The Title IX Coordinator
 - **Officials with Authority** to institute corrective measures on behalf of the recipient.

388

Response to Reports of DVSAAS

- The next slides will review Clery Act and Title IX requirements in response to reports of DVSAAS.
- The timeline below will show which part of the process we are considering as we walk through the response and disciplinary proceedings for a report of DVSAAS.



389

Before a Report: Clery Act

- Written notice to employees and students about services on- and off- campus in:
 - Counseling, health & mental health
 - Victim advocacy and legal assistance
 - Visa and immigration assistance
 - Student financial aid
 - Other applicable services



390

Before a Report: Title IX

- Publish prominently on the institution's website:
 - Non-discrimination policy based on sex
 - Training materials used in training all Title IX Coordinators, administrators, hearing officials and investigators.
 - Title IX Coordinator contact information; and distribute their info in handbooks and catalogs

Before a
Report

391

A Report is Received: Clery Act

Community-focused Response

- Engage in a Timely Warning Analysis to determine if there is a serious or ongoing threat requiring an alert
- Determine whether the incident must be added to the Daily Crime Log and the Annual Security Report

Victim-focused Response

- Provide a written explanation of rights and options
- Information on the confidentiality of accommodations and records

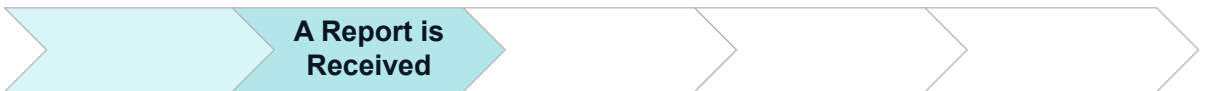
A Report is
Received

392

Written Rights & Options: Preserving Evidence

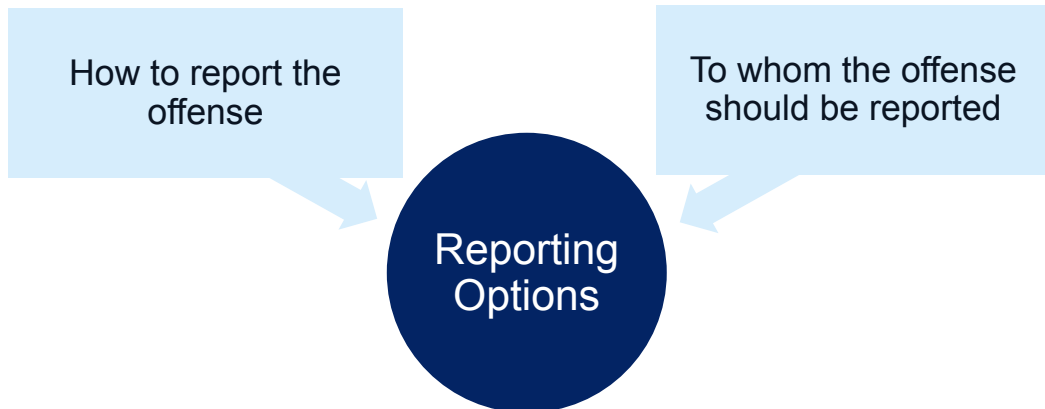
Importance of Preserving Evidence:

- **Proof in a criminal or campus disciplinary proceeding**
- **May be helpful in obtaining a protection order**
- Knowledgeable of what may be preserved and for how long
- Recent/fresh complaints
- Basic preservation instructions/tips



393

Written Rights & Options: Reporting Options



394

Written Rights & Options: Rights of Reporting Parties

Involvement of law enforcement and campus authorities, including notification of the victim's option to:

- **Notify** proper law enforcement authorities, including on-campus and local police
- **Be assisted** in notifying law enforcement authorities if victim so chooses
- **Decline** to notify authorities
- **Rights of victim and institution's responsibilities** for orders of protection, no contact orders, restraining orders, or similar lawful orders issued by criminal, civil, or tribal court or by the institution



A Report is
Received

395

Written Rights & Options: Confidentiality

Information about how the institution will protect the confidentiality of victims and other necessary parties

- Publicly available record-keeping (ex: timely warnings, daily crime log)
- Without the inclusion of personally identifying information about the victim
- Any accommodations or protective measures provided to the victim (to the extent it will not impair institution's ability to provide them)



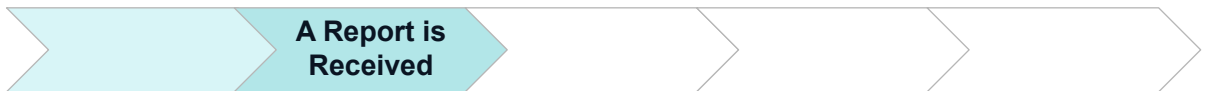
A Report is
Received

396

A Report is Received: Title IX

When a report is received under Title IX, the institution must respond promptly and in a manner that is not Deliberately Indifferent.

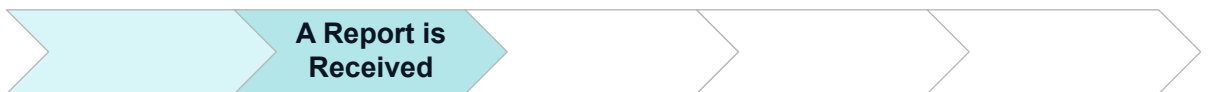
- ***Deliberately Indifferent*** is when an institution's "response to sexual harassment is clearly unreasonable in light of the known circumstances."



397

A Report is Received: Title IX

- Ensure complainant and respondent are treated equitably
- Contact the complainant to discuss:
 - the availability of supportive measures
 - the availability of measures regardless of a complaint
 - the complainant's wishes regarding implementing
 - the process for filing a formal complaint under Title IX
- If no complaint filed, determine if fact pattern should lead Title IX Coordinator to sign a formal complaint.



398

Accommodations vs. Supportive Measures

The Clery Act

Accommodations

- Must be provided in writing
- Options for, available assistance in, and how to request changes to:
 - Academic, Living, Transportation, Working and Protective Measures

Title IX

Supportive Measures

- Must be offered to complainant **and** to a respondent
- Before or after the filing of a formal complaint, or where no formal complaint has been filed
- Designed to restore or preserve equal access to educational program and activity.



A Report is Received

399

Accommodations vs. Supportive Measures

The Clery Act

Accommodations

- If requested by the victim and reasonably available
- Regardless of whether the victim chooses to report to campus police or local law enforcement

Title IX

Supportive Measures

- Non-disciplinary, non-punitive individualized services offered as appropriate.
 - Reasonably available.
 - Without Fee or Charge
- Doesn't require a formal complaint for complainant to receive support.



A Report is Received

400

Comparing In-Text Examples

The Clery Act

- Academic
- Living
- Transportation
- Working
- Protective Measures

Title IX

- Counseling;
- Extension of deadlines or other course-related adjustments;
- Modifications of work or class schedules;
- Campus escort services;
- Restrictions on contact between the parties;
- Changes in work or housing locations;
- Leaves of absence;
- Increased security and monitoring of certain areas of the campus;
- Other similar measures.



A Report is
Received

401

Moving from Report to Complaint

- A report is information being disclosed that an incident, crime or behavior occurred; whereas:
- A formal complaint under ***Title IX*** is a “formal document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment...and requesting that the recipient investigate the allegation”.

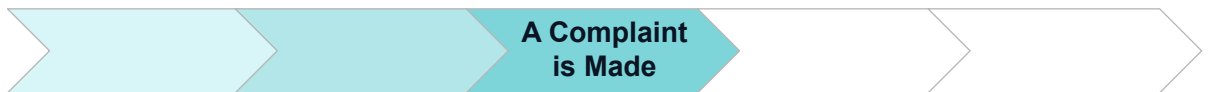


A Report is
Received

402

A Complaint is Made: Clery Act

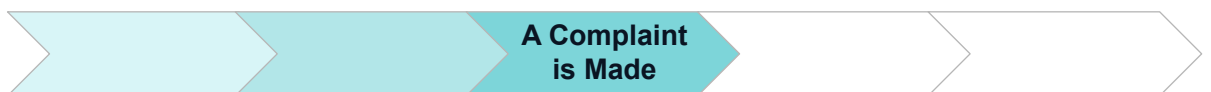
- Provide clear information about how to file complaints in your disciplinary processes.
 - If there are different processes used to initiate Title IX as well as non-Title IX complaints, disclose both.
 - *Ex: Resolving a sexual assault at a work conference in Canada.*
- Include information to help people distinguish between a complaint and a report.



403

A Complaint is Made: Title IX

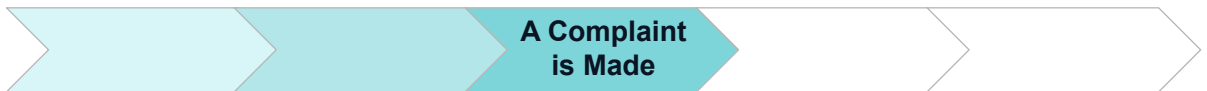
- Under Title IX, a formal complaint is a written and signed document by:
 - **a complainant** who is participating or attempting to participate in an educational program or activity; or
 - **the Title IX Coordinator**, if the nature of the alleged behavior is severe enough to warrant investigation to prevent deliberate indifference in response.
- It may be filed in person, by mail, or electronically



404

A Complaint is Made: Title IX

- TIXC must offer Supportive Measures to the Respondent.
- Provide written notice to the both parties that includes:
 1. Grievance Procedures & Informal Resolution Processes
 2. Notice of the alleged behavior constituting harassment, including date, time and location of alleged behaviors if known
 3. Identities of known parties
 4. Statement of presumed innocence of respondent
 5. Notice of an advisor of choice, who may be an attorney
 6. Notice of right to inspect and review evidence
 7. Notice that false statements or evidence is prohibited



405

Assessing for Dismissal: Title IX

Must be dismissed

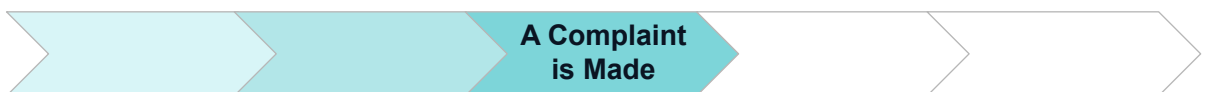
- is not sexual harassment
- did not occur in an educational program or activity
- did not occur against a person in the United States

Dismissing does not prohibit addressing the behavior under other codes of conduct.

May be dismissed

at **any point** prior to the resolution if:

- the complainant notifies the TIXC they would like to withdraw
- the respondent is no longer enrolled or employed by the institution
- gathering sufficient evidence to reach a determination becomes impossible



406

Disciplinary Proceedings: Clery Act

- Must be prompt, fair, and impartial
- Be conducted by officials who receive annual training
- Both parties (complainant and respondent) must have
 - the right to an advisor of choice at any proceeding.
 - Simultaneous written notification of the results of any proceeding



407

Proceeding Under Clery

Includes:

- Fact-finding investigations
- Formal or informal meetings
- Hearings

Does Not Include:

- Communications and meetings between officials and victims concerning accommodations or protective measures to be provided to a victim



408

Prompt, Fair and Impartial: The Clery Act

- Must be reasonably prompt as designated by your policy
 - Provide written notice about delays with good cause
- Consistent with policy and transparent
- Include timely notices for meetings
- Provide timely and equal access to information used during informal and formal procedures
- By officials who do not have conflict of interest or bias



409

Disciplinary Procedures: Title IX

- Could be formal grievance procedures or informal resolutions
- May consolidate multiple complaints
- Must be prompt and equitable
 - Equal Opportunity to present witnesses
 - Equal Opportunity to inspect and provide evidence
 - Equal Opportunity to presence of an advisor of choice



410

Disciplinary Procedures: Title IX

- Requires minimum time for parties and advisor to review and respond to investigation report before the live hearing.
- Hearings must allow for live cross examination of parties and witnesses by the advisor
- Live hearings may use technology to allow individuals to appear virtually.



411

Disciplinary Procedures: Title IX

- Provide a simultaneous written notification of outcome including:
 - The allegations potentially constituting harassment
 - The procedural steps taken
 - Findings of fact supporting the determination
 - Conclusions regarding the application of the code of conduct
 - Statement and supporting rationale of results to each allegation
 - Appeal procedures



412

Advisor of Choice

- Both Title IX and the Clery Act allow for an advisor of choice.
 - Clery Act: Cannot limit who is selected, but can limit how they are allowed to participate
 - Title IX: “may be, but is not required to be, an attorney”



413

Standard of Evidence

The Clery Act

- Must describe the standard of evidence that will be used

Title IX

- Must state which standard is used: “**preponderance of the evidence**” or “**clear and convincing**”; and
- Must be same standard for all formal complaints of sexual harassment, regardless of respondent’s role (*i.e. faculty, staff, student, union employee, etc.*)



414

Sanctions & Remedies

The Clery Act

- Must list all possible sanctions
- Must describe range of protective measures

Title IX

- Must describe range of sanctions, *but...*
- Must describe range of remedies



415

Resolution: Clery Act

- Simultaneous written notification of any changes to the result of outcome of appeals and when the results will become final
 - Either because the appeal has lapsed, or
 - The final result after appeals



416

Resolution: Title IX

- Must allow appeals for: procedural irregularities, new evidence, or conflicts of interest/bias from TIXC, investigators, or decision-makers
- Notify the other party in writing when an appeal is filed
- Have a decision-maker who was not the hearing decision-maker, dismissal decision-maker, the investigator, or the Title IX Coordinator
- Give both parties the chance to submit a written statement
- Provide written notice of the decision simultaneously to both parties



417

Who Must Be Trained?

The Clery Act

- **Officials who conduct disciplinary proceedings** to address crimes of:
 - Dating Violence
 - Domestic Violence
 - Sexual Assault
 - Stalking

Title IX

1. Title IX Coordinators
2. Investigators
3. Decision-makers (hearings & appeals)
4. Any person who facilitates an informal resolution process

“Officials who conduct disciplinary proceedings” includes all individuals who also must be trained under Title IX requirements.

418

Training Topics Under the Clery Act

- Issues related to DVSAS
- Conducting an investigation and hearing process that:
 - Protects the safety of victims
 - Promotes accountability

419

Annual Training Components

The Clery Act & Title IX

- Relevant evidence and how it should be used during a proceeding
- Proper techniques for interviewing witnesses
- How to serve impartially
- Avoiding actual and perceived conflicts of interest

Just Title IX

- Definitions in policy and scope of programs
- Procedures for investigations, informal resolutions, and hearings
- Technology used in hearings
- Training materials may not rely on sex stereotypes
- Must publish all training materials for public online

420

Other Possible Training Components

- Effects of trauma
- Cultural responsiveness training
- Accessibility needs for parties in proceedings
- Any others to highlight here?

421

Anti-Retaliation Responsibilities

The Clery Act

- Institutions must protect individuals from being retaliated against:
 - for exercising one's rights, or
 - carrying out the responsibilities of any portion of the Clery Act
- Does not create a mechanism for how to address this retaliation

Title IX

- May not retaliate for anyone for participating or refusing to participate
 - Includes complainants, respondents, witnesses, advisors, etc.
- Retaliation complaints are filed under the same grievance procedures for sex discrimination.

422

Bigger Picture Questions

- Who are your campus partners in responding to these crimes?
- How do Clery requirements enhance institutional response?
- How can compassionate response by campus community be promoted?
- What are next steps to build upon Clery efforts related to response to these crimes and the collaboration underlying that effort?

423

Annual Security Report Policy Statements

All the following required policy statements reference reported crimes of DV/SAS

The Clery Act definition of Sexual assault is an offense that meets the definition of rape, fondling, incest, or statutory rape.

Policy Statement: Procedures to Follow

- Importance of preserving evidence in proving allegations and/or obtaining protection orders
- How and to whom one can report a crime of dating violence, domestic violence, sexual assault or stalking.
 - Contact information
 - Link to reporting form if applicable

Policy Statements: Reporting Options

- Options for involvement in reporting:
 - Local law enforcement and campus police
 - Receiving assistance from campus authorities in reporting to law enforcement
 - Ability to decline to notify authorities
- Rights and options for obtaining orders of protection, no-contact orders, etc. and the institution's responsibility for enforcing these orders

427

Policy Statements: Confidentiality & Written Notifications

- Confidentiality of public records, accommodations & protective measures
- Written notifications
 - To all students and employees
 - To victims/survivors who report

428

Policy Statement: Written Information

To Students & Employees

- Notification of on- and off- campus services
- Counseling
- Health
- Mental Health
- Victim Advocacy
- Legal assistance
- Visa and immigration assistance
- Student financial aid
- Other services available for victims

To Victims After a Report

- Accommodations
- Rights & options

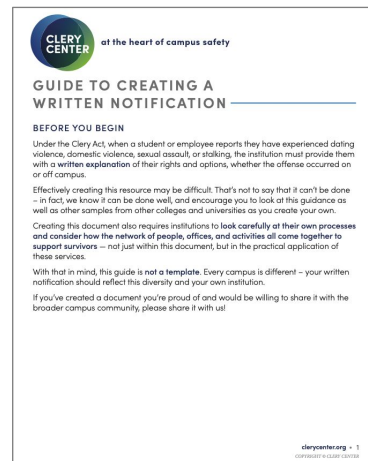
429

Back on Campus: Written Notification



Guide to Creating a Written Notification

- Use this resource to carefully assess processes and consider how a network of people, offices, and activities all come together to support survivors
- Look at this guidance, as well as other samples from other colleges and universities as you create your own



430

Policy Statements: Disciplinary Procedures

1. Description of all types of disciplinary proceedings including steps, anticipated timelines, and decision-making processes
2. How to file a disciplinary complaint
3. How the institution determines which proceeding is used based on the complaint
4. Describes the standard of evidence used
5. Lists all possible sanctions and outcomes
6. Describes the range of protective measures available for victims

431

Policy Statements: Conducting Proceedings

1. Prompt, fair and impartial process from initial investigation to final result
2. Conducted by officials receiving annual training
 - a. issues related to DVSAAS
 - b. conducting investigations and hearings that protect safety and promote accountability
3. Allow for an advisor of choice for both parties

432

Policy Statements: Simultaneous Written Notification of Outcome

- Simultaneous written notification of outcome to both parties for any disciplinary proceeding for DVSAAS
 - Rights and procedures for appealing the outcome, if available
 - When results of any proceeding are changed
 - When results of a proceeding become final

433

Student Disciplinary Procedures

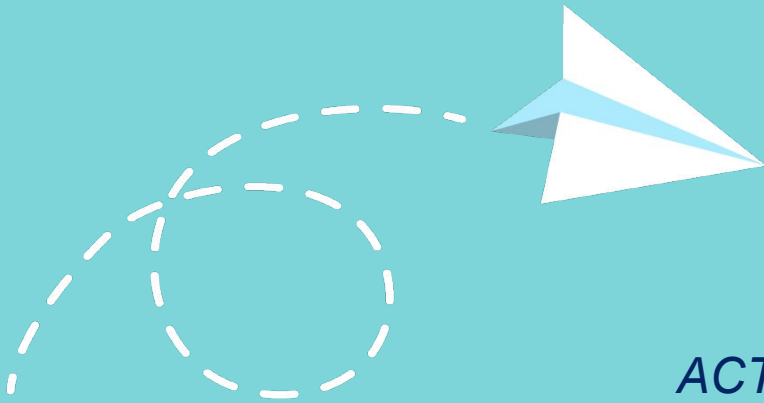
Statement that upon request institution will disclose the results of a disciplinary proceeding for a violent crime or non-forcible sex offense (incest or statutory rape) to:

The victim of such crime or offense

OR

The next of kin, if the victim is deceased

434



ACTIVITY
Policy Statement Review

PRACTICE USING ASR CHECKLIST



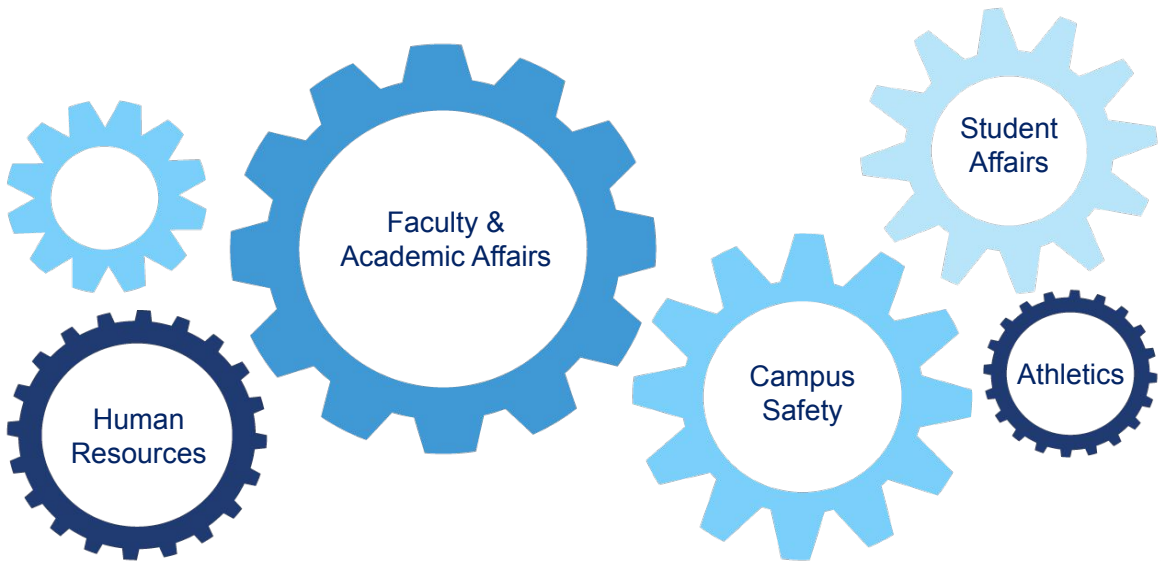
- Look for the elements under this policy statement:
 - Dating violence, domestic violence, sexual assault, and stalking (DVSAS) policy statements
 - Student disciplinary procedures
- Complete the ASR checklist with your notes

Clery Compliance Team

Learning Objectives

- Discuss importance of an institutional team approach to Clery compliance work
- Identify key allies and potential collaborators at an institution, and in the local community

Campus Safety: An Institutional Responsibility



439

Institutionalization

To cause (a custom, practice, law, etc.) to become accepted and used by many people.

- Process which translates an organization's code of conduct, mission, policies, vision, and strategic plans into action.
- Aims to integrate fundamental values and objectives into the (school's) organizational culture and structure.

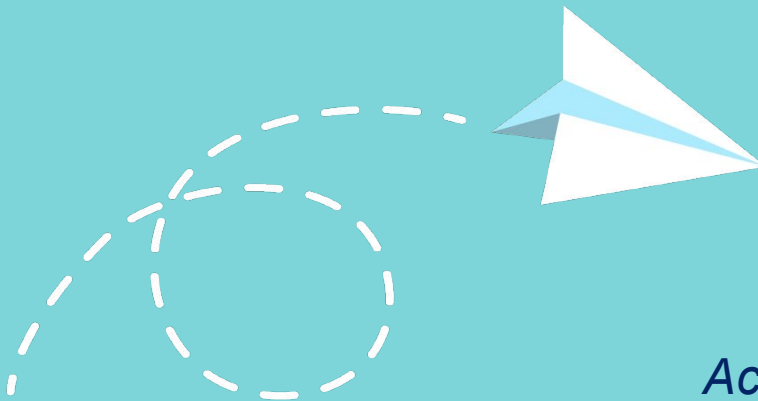
440

Institutionalization on Campus

PEOPLE • PRIORITIES • PLACES • PURSE STRINGS

- Outward commitment from senior leadership
 - Inclusion in institutional strategic plan and mission/vision statements
- Compliance team or working group
 - Members
 - Frequency
 - Level of activity and progress
- Infrastructure, physical space, online presence

441



Activity:
Clery Fantasy Draft

Clery Fantasy Draft

Go to the **Clery Fantasy Draft** Workbook activity. You will find a list of job positions at your institution.

- As an individual, rank your top 5 picks and your top 5 “sleeper” picks; then,
- Meet as a group. Pick a captain and team name. Decide as a group who you would like to pick for your Clery Compliance team. You will then draft against other the groups. Once someone has been selected, other groups cannot pick that person.

443

Multiple Tasks and Many Partners

Clery Compliance Team

- Oversees tasks
- Project management skills
- Coordinates collaboration and communication among partners
- ASR as starting point

444

Lack of Administrative Capacity

Fast Facts:

- Lacked adequate systems for internal controls
- Failed to maintain records
- Lacked adequate training, coordination, oversight, and supervision in security operations
- Examples: no reporting from residence halls; standardization, custody, and control of records; training CSAs on proper documentation; policies and processes didn't incorporate rights and options

Action Items:

- Comprehensive system of policies and procedures
 - Reporting systems and training
 - Regular review of information
 - Identification, notification, and training of CSAs
 - Policy review and updates and putting policy into practice

ASR: Finishing Touches and Requirements

Reminder: Topics Addressed in ASR

Policy Statements

1. Compiling the ASR
2. Security of and Access to Campus Facilities
3. Law Enforcement & Jurisdiction
4. Reporting Crimes and Other Emergencies
5. Timely Warnings
6. Emergency Notification and Evacuation Policies
7. Alcohol and Other Drug Policies
8. Hazing Policies and Prevention Programs
9. Dating Violence, Domestic Violence, Sexual Assault, Stalking
10. Student Disciplinary Proceedings
11. Missing Student Notification Procedure

Descriptions

1. Security Awareness Programs
2. Crime Prevention Programs

Statement

Sex Offender Registration

Statistics

Clery Crimes in Clery Geography

447

Policy Statements We've Covered

Day 1

- Compiling the ASR
- Security of and Access to Campus Facilities
- Law Enforcement & Jurisdiction
- Reporting Crimes and Emergencies

Day 2

- Policies on Hazing
- Timely Warnings
- Emergency Notifications & Evacuation Procedures

Day 3 (so far)

- Crime Prevention & Security Awareness Programs
- AOD Policies
- Hazing Prevention
- DVSAS Prevention
- DVSAS Disciplinary Procedures

448

ASR Topics Left to Cover: Overview

- Registered Sex Offender Statement
- Policies for Institutions with On-Campus Housing
 - Missing Student Notification
 - Fire Safety Report
- Annual Statistics Reporting

449

Registered Sex Offender Information

- Advises the campus community where information provided by the state concerning registered sex offenders may be obtained
 - Only required to inform the campus community
 - NOT required to collect information
 - Must include the exact URL in the ASR

450

On-campus Student Housing Facility Specific Policy Statements

- Missing Student Notification
- Fire Safety Report

451

On-campus student housing facility



A dormitory or other residential facility for students that is located on an institution's campus

452

Missing Student Notification Policy Statements

- List of titles of persons or offices to report
- The institution's requirement to act starts at Hour 24, but can be sooner. Your policy should be clear for reports to occur **at or before** this point.



453

Missing Student Notification Policy Statements

- Immediate referral of reports to campus security, police, or law enforcement
 - Must be immediate regardless of timeframe, even if not yet reached 24 hours
- Option to identify a contact person

454

Missing Student Notification Policy Statements

- Advise that contact information is registered and confidential
- Advise if under 18 & not emancipated that custodial parents must be notified within 24 hours
- Advise that local law enforcement will be informed within 24 hours

Fire Safety Report

Annual Fire Safety Report

- A description of each on-campus student housing facility fire safety system
- Number of fire drills held in each student housing facility during the previous calendar year
- Policies or rules on portable electrical appliances, smoking and open flames in a student housing facility
- Institution's procedures for student housing evacuation in the case of a fire

457

Annual Fire Safety Report (cont'd)

- Policies regarding fire safety education and training programs provided to students and employees
 - Describe procedures that students/employees should follow in the case of a fire
- A list of titles to which students and employees should report that a fire occurred
- Plans for future improvements in fire safety

458

Fire Statistics

- Reported fires in on-campus student housing facilities
- Identify each facility by name and street address
- Disclose:
 - Number of fires and cause of each fire
 - The number of persons who received fire-related injuries that resulted in treatment at a medical facility, including at an on-campus health center
 - The number of deaths related to a fire
 - The value of property damage caused by a fire

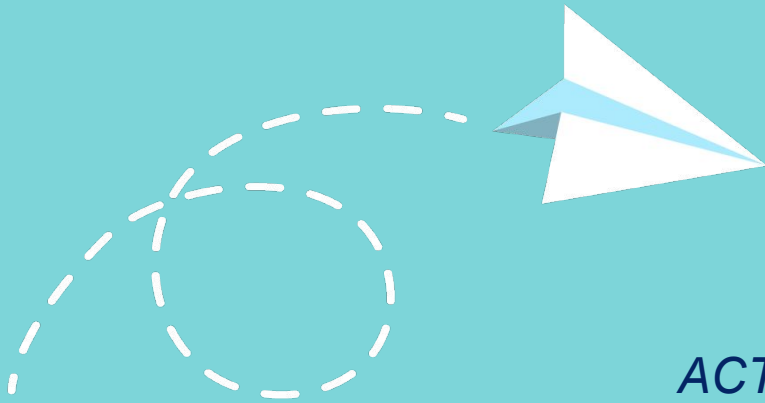
459

Example: Fire Statistics Table

2022 Residential Facilities Fire Statistics and Related Information

Residential Facilities Name and Address	Total Number of Fires	Fire Number	Cause of Fire	Number of Injuries that Required Treatment at a Medical Facility	Number of Fire-Related Deaths	Value of Property Damage Caused by Fire (in dollars)
Parker Hall 195 7th St	2	1	Unintentional/ Stove Fire	1	0	665.23
		2	Unintentional/ Candle Fire	0	0	154.27
Grant Hall 415 Grant St	1	1	Intentional/ Flyer set on fire	0	0	58.75
Reynolds Hall 672 9th St	1	1	Undetermined	0	0	246.84
Bernard Hall 543 10th St	0	0	Not Applicable	Not Applicable	Not Applicable	Not Applicable

460



ACTIVITY

Policy Statement Review

Practice Using the ASR Checklist



- Look for the elements under these policy statements:
 - Missing Student Notification
 - Fire Safety Report
 - Registered Sex Offender
- Complete the ASR checklist with your notes

The Annual Security Report

Presenting Crime Statistics

Crime Presentation: Three Required Elements

Calendar Year

Year crime was reported

Three most recent years

Type of Crime

Clery Act crimes

Arrests & disciplinary referrals

Geographic Area

On-campus property
- Student housing facilities

Noncampus property

Public property

Crime Classification		Campus		Noncampus	Public Property	Total
		On Campus Student Housing	On-Campus Total			
Murder/ Non-Negligent Manslaughter	2022	1	1	0	0	1
	2021	0	0	0	0	0
	2020	0	0	0	0	0
Manslaughter by Negligence	2022	0	0	0	0	0
	2021	0	0	0	0	0
	2020	0	0	0	0	0
Rape	2022	10	12	1	0	13
	2021	13	13	0	0	13
	2020	8	9	2	0	11
Fondling	2022	4	5	0	2	7
	2021	3	3	1	2	6
	2020	5	6	1	4	11
Incest	2022	1	1	0	0	1
	2021	0	0	0	0	0
	2020	0	0	0	0	0

NOTE: References sample structure only – the above table does not include all crime categories.

465

Example: Arrests & Referrals

Crime Classification	Year	On-Campus		Noncampus	Public Property	Total
		On-Campus Housing	On-Campus Total			
Arrests						
Weapons Law Violations	2022	3	6	0	0	6
	2021	0	0	0	2	2
	2020	3	4	0	0	4
Drug Abuse Violations	2022	25	39	0	6	45
	2021	14	24	0	15	39
	2020	13	28	0	25	53
Liquor Law Violations	2022	14	33	0	0	33
	2021	15	29	0	9	38
	2020	82	94	0	1	95
Referrals for Disciplinary Action						
Weapons Law Violations	2022	1	1	0	0	1
	2021	0	0	0	0	0
	2020	0	0	0	0	0
Drug Abuse Violations	2022	93	123	0	0	123
	2021	70	85	0	2	87
	2020	82	94	0	1	95
Liquor Law Violations	2022	119	183	1	8	192
	2021	130	142	0	2	120
	2020	109	113	0	7	120

466

*Hazing should first be a reported category in
your Annual Security Report published on
October 1, 2026.*

*Hate Crimes & Unfounded Crimes can be
presented in a tabular or narrative format*

Example: Hate Crime Tabular Format

Crime	Bias Category	Campus		Noncampus	Public Property	Total	
		On Campus Student Housing	On-Campus Total				
Simple Assault	2022	Race	1	1	0	0	1
		Ethnicity	0	0	0	0	0
		Religion	0	0	0	0	0
		Sexual Orientation	0	0	0	0	0
		Gender	0	0	0	0	0
		Gender Identity	0	0	0	0	0
		National Origin	0	0	0	0	0
		Disability	0	0	0	0	0
	2021	Race	0	0	0	0	0
		Ethnicity	0	0	0	0	0
		Religion	0	0	0	0	0
		Sexual Orientation	0	0	0	0	0
		Gender	0	0	1	0	1
		Gender Identity	0	0	0	0	0
		National Origin	0	0	0	0	0
Disability	0	0	0	1	1		

469

Sample Hate Crime Narrative Format

Example 1

- 2022: One on-campus Intimidation incident characterized by religious bias.
- 2021: One noncampus Robbery characterized by National Origin bias, and one public property Aggravated Assault characterized by Sexual Orientation bias.
- 2020: No Hate Crimes reported.

Example 2

- Hate Crimes: There were no reported Hate Crimes for the years 2020, 2021 or 2022.

470

Considerations for Narrative Format

- Narrative requires context. How would someone know:
 - if you evaluated all required crimes?
 - if you evaluated all required bias categories?
- Provide summaries and definitions in your ASR
 - crime categories
 - geography designations
 - bias categories

471

Context Statement Example

Clery University evaluates all reported crimes of murder/ non-negligent manslaughter, rape, fondling, incest, statutory rape, robbery, aggravated assault, burglary, motor vehicle theft, and arson as well as the crimes of simple assault, intimidation, larceny-theft, and destruction, damage or vandalism of property for hate crimes. Hate crimes are reported by Clery geography.

Hate crimes included in these statistics are any of the above crimes categorized by a preformed negative opinion or attitude toward a group of persons based on the categories of race, gender, gender identity, religion, sexual orientation, ethnicity, national origin and disability.”

472

Presentation of Unfounded Crimes

Unfounded Crimes

- Present in either a tabular format or in a narrative or descriptive format
- One statistic for each of the three most recent calendar years
- Total number of unfounded crimes across all Clery Act geographic areas
- Not required to break down by geographic category or type of crime

473

Collecting Statistics from Local Law Enforcement

Establishing Cooperative Relationships

- Determine correct local police agency
- Call early in the calendar year - speak with a supervisor
- Inquire about extent of their authority
- Determine contact points
- Determine when to contact
- Document good faith effort

475

Document Good Faith Effort

- What is needed?
- Why is it needed?
- When is it needed?
- Where should it be sent?
- To whom it should be sent
- The format in which it needs to be provided

476

What About....

If you're directed to a website?

- Can use if you can identify statistics for Clery geography and confirm the website is up to date
- Must still request statistics annually

If you get non-UCR statistics?

- Personnel familiar with UCR may be able to reclassify
- Can request clarification

If you get statistics you can't attribute to Clery geography?

- If you can't determine whether any statistics apply to or include Clery geography, provide caveat explaining statistics were requested but not provided in usable format

477

Red Flags

- Burglaries on public property
- Large numbers of crimes on public property
- Missing geography
- Statistics for incest and statutory rape

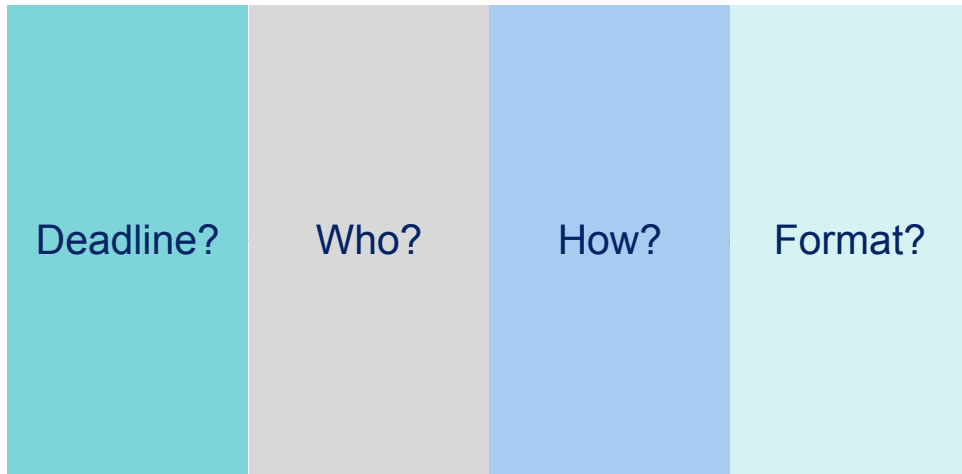
478

Publishing the ASR

Annual Security Report

- You must:
 - Publish the report by the deadline
 - Include the required policy statements
 - Include three previous calendar years' worth of statistics
 - Determine who gets the report
 - Distribute the report
 - Retain records associated with the report

Publication & Distribution: Four Components



481

October 1

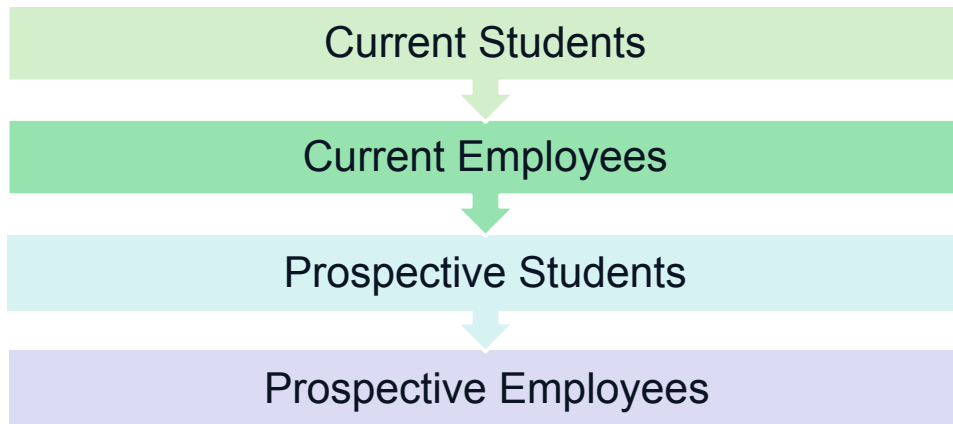
Earlier

Not
Later

No
Grace
Period

482

Who gets the Annual Security Report?



483

Prospective Students/Employees

Individuals who have contacted an eligible institution requesting information about:

- Admission
- Employment

If soliciting an application for position through an advertisement, provide a notice of the availability of the ASR to those individuals interviewed.

484

ASR Direct Distribution

Current Students & Employees

- U.S. Postal Service
- Campus Mail
- Email

Prospective Students & Employees

- **Notice of the report's availability**
 - Description of its content
 - Opportunity to request
 - Unlike notice to current students and employees, this may be provided along with other information

485

ASR Online Distribution

Current Students & Employees

- A statement of the report's availability
- A list and brief description of the content
- Exact URL
- Statement that a paper copy is available upon request

Prospective Students & Employees

- Exact URL
- Brief description of the report
- Statement that a paper copy is available upon request

486

A link to your current Annual Security Report is required to be published with your Campus Hazing Transparency Report.

An Exact URL

- The exact address wherein the report lies –
 - Can't be the institution's homepage
- Permissible to provide links to other pages that provide information on additional required elements or resources such as:
 - Crime log
 - Annual security reports for other campuses
 - Local victim assistance agencies

Annual Security Report Sample Notice Of Availability

This report includes statistics for the previous three years concerning reported crimes that occurred on campus; in certain off-campus buildings or property owned or controlled by (name of institution); and on public property within, or immediately adjacent to and accessible from, the campus.

The report also includes institutional policies concerning campus security, such as policies concerning sexual assault, and other matters.

You can obtain a copy of this report by contacting (name of office) or by accessing the following web site (address of website).

489

Accessibility Considerations for the ASR

- Are font sizes and styles easily readable?
- Is there enough color contrast between text and background?
- Are hyperlinks clearly described?
- Are tables easy to read?
- Do images and graphics have alternative text?
- How would a screen reader read the document?

490

Splits Cells & Merged Cells

- Screen readers have difficulty reading data tables that use split cells and merged cells
- Information may not be read correctly to those readers utilizing a screen reader

No split or merged cells

Column 1	Column 2	Column 3
Every	cell (box)	is
a	single	cell.
No	split or	merged cells

Split Cells & Merged Cells

Column 1	Column 2	Column 3
This is a merged cell.		
		This is a Split cell

491

Example: Accessible Table

2022 Crime Statistics

Offense	On-Campus Housing	On-Campus Total	Noncampus	Public Property	Total
Robbery	2	4	0	0	4
Aggravated Assault	6	6	0	1	7
Burglary	14	16	2	0	18
Motor Vehicle Theft	0	24	0	0	24

492

Example: Accessible Table

2022 Arrests

Type of Arrests	On-Campus Housing	On-Campus Total	Noncampus	Public Property	Total
Weapons Law Violations	3	6	0	0	6
Drug Abuse Violations	25	39	0	6	45
Liquor Law Violations	14	33	0	0	33

2022 Disciplinary Referrals

Type of Disciplinary Referrals	On-Campus Housing	On-Campus Total	Noncampus	Public Property	Total
Weapons Law Violations	1	1	0	0	1
Drug Abuse Violations	93	123	0	6	123
Liquor Law Violations	119	183	1	8	192

493

Example: Accessible Table

2022 Hate Crime Statistics

Crime	Bias Category	On-Campus Student Housing	On-Campus Total	Noncampus	Public Property	Total
Simple Assault	Race	1	1	0	0	1
Simple Assault	Ethnicity	0	0	0	0	0
Simple Assault	Religion	0	0	0	0	0
Simple Assault	Sexual Orientation	0	0	0	0	0
Simple Assault	Gender	0	0	0	0	0
Simple Assault	Gender Identity	0	0	0	0	0
Simple Assault	National Origin	0	0	0	0	0
Simple Assault	Disability	0	0	0	0	0
Larceny-Theft	Race	0	0	0	0	0
Larceny-Theft	Ethnicity	0	0	0	0	0
Larceny-Theft	Religion	0	0	0	0	0
Larceny-Theft	Sexual Orientation	0	0	0	0	0
Larceny-Theft	Gender	0	0	1	0	1
Larceny-Theft	Gender Identity	0	0	0	0	0
Larceny-Theft	National Origin	0	0	0	0	0
Larceny-Theft	Disability	0	0	0	1	1

494

Distribution: Fire Safety Report

Institutions that must distribute a fire safety report
(those with on-campus student housing)
should utilize the same distribution methods.

Publishing the ASR

Corrections and Record Keeping

Updates are Everywhere

- Updating policies, statements and practices affects others
 - Written resources are especially important
 - Multiple departments may have updates to one procedure
 - Identify areas where overlap between departments exist, for procedural changes
- Two-way street. Communication flows both ways.

497

Example of Updates in Multiple Locations:

Hazing policies are in 3 places:

1. Policy statement in ASR about hazing policies
2. The website hosting the Campus Hazing Transparency Report
3. In the content for hazing prevention programs

498

Correcting the ASR

If corrections are made following release, must update ASR

Crime Statistics

- Ensure updates in ASR align with submission to Dept. of Education
- If not, inform them that changes were required.

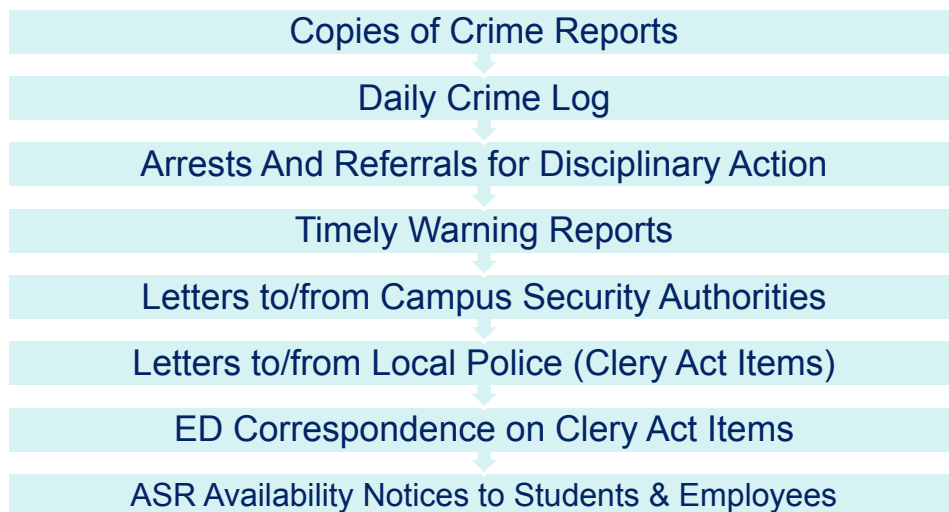
Policy Statements

- Update is made only in most recent ASR
- Example: Updating a Timely Warning policy in June 2025 will need to be updated only in the 2023 ASR.

- Redistribute: include change(s) in the notice
 - what change(s), date they was made, and reasons for change(s)

499

Records to Retain

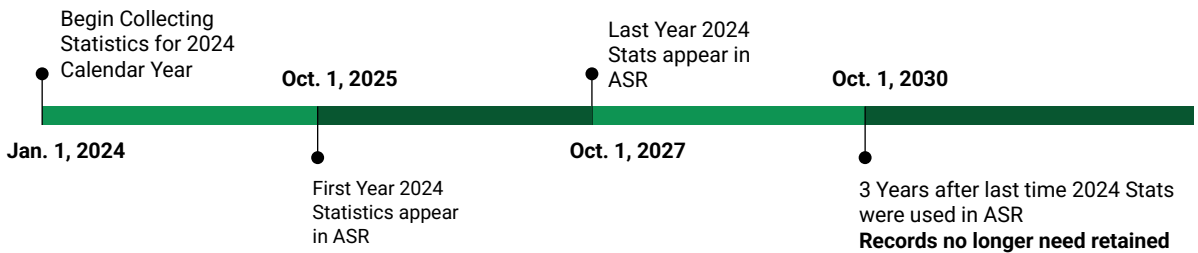


500

Record Keeping Timeline

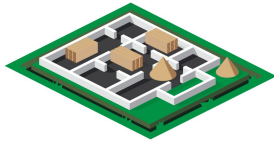
Retain the ASR and all supporting records used to compile the report for 3 years from the latest publication of the report to which they apply.

- In effect 7 years

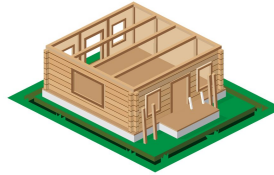


Putting It All Together

Building Skills from the Ground Up



The Why



The ASR



4 W's



Ongoing Disclosures



Community Education

Clery Act Overview

Who: Campus Security Authorities (CSAs) and local law enforcement

Where: Clery Act geography

What and How: **Annual**

- Annual security report (statistics, policy statements)
- Statistics to Department of Education

Ongoing

- Disclosures (timely warnings, emergency notification, daily crime log)
- Rights and options for victims of dating violence, domestic violence, sexual assault, and stalking

Enforcement: U.S. Department of Education (ED) Clery Compliance Group

Building a Sustainable Structure

- Heart of compliance - prevention
- Institutionalization
- Making it part of the culture- cultural shift
- Establishing buy-in
- Developing a culture of compliance and a standard of crime prevention and response

505

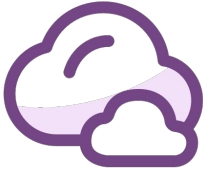
Looking Forward

- Review all of your “Reminders” pages in your workbook
- Evaluation Survey & Certificate to follow
- Future Trainings
- Clery Membership



506

Do not edit
How to change the design

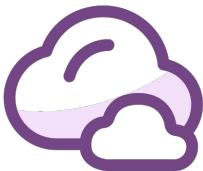


What do you feel more confident about now than when you started this training?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Do not edit
How to change the design



What is one area that you want your institution to work on?

 Presenting with animations, GIFs or speaker notes? Enable our [Chrome extension](#)

slido

Become a Member!

Clery Center offers two Membership tiers, each providing resources, strategies, and unparalleled expertise to support you in understanding and implementing the provisions of the Clery Act.

Institutional

- ASR review
- Free training
- In-depth compliance calls
- CSA training video
- Welcome kit
- All Individual Membership benefits
- and more!

Individual

- Unlimited technical assistance & support
- Discounted training
- Member Portal access
- Exclusive Member resources
- Member-only webinars
- and more!

Learn more at clerycenter.org/membership

Clery Center Institutional Membership can help with common compliance challenges

Creating and evaluating the ASR

ASR review by Clery experts

Identifying & training CSAs

Access to CSA Training film and supplemental materials

Building and training a multidisciplinary team

Free & discounted training & workshops

No "one size fits all" for Clery compliance

Technical assistance and Clery compliance tools & resources



CLERY CENTER

501 Office Center Drive, Suite 8
Fort Washington, PA 19034
484.580.8754

info@clerycenter.org
clerycenter.org

Connect with us on social media!
@Clery Center

