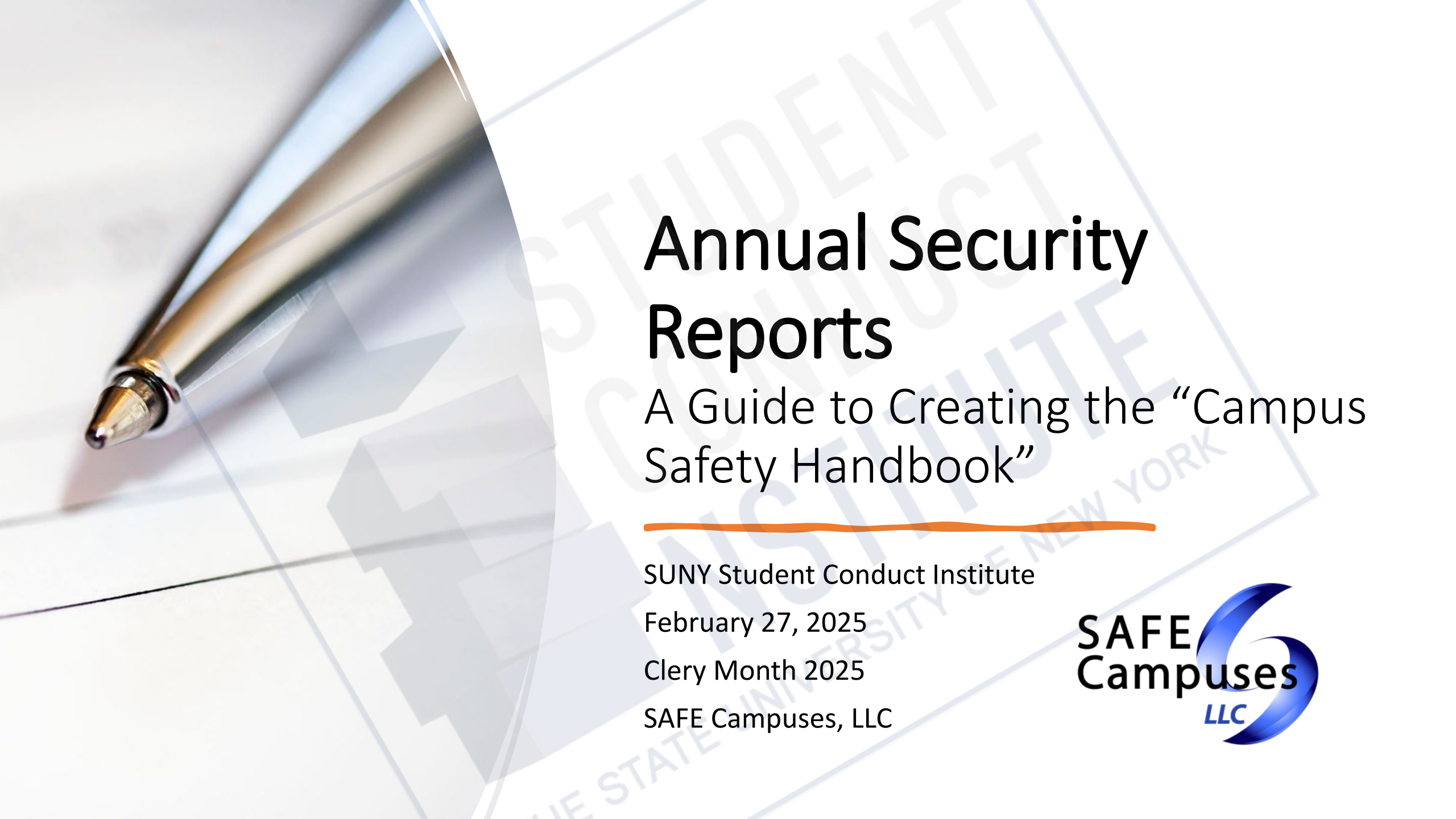




Annual Security Reports

A Guide to Creating the “Campus Safety Handbook”

SUNY Student Conduct Institute

February 27, 2025

Clery Month 2025

SAFE Campuses, LLC



Jeanne Clery Campus Safety Act

- **Jeanne Clery**
 - Murdered 1986
 - Campus security reporting law 1990
 - *Name modernized 2025*
- **New Name – Places focus on goal not mechanics**



A Different Type of Clery Training

- SAFE Campuses, LLC is a social entrepreneurship devoted to safer learning environments
- **Primary objective is safer campuses not mere compliance**
- *This training focuses on how to gather & present campus safety information*
- It won't be a compliance checklist, but an Ed. Dept. reference has been provided



Inquiring Minds

- Are you involved in creating your institution's Annual Security Report?
 - Yes
 - No
 - What's an ASR?



Annual Security Report

20 U.S. Code § 1092(f)(1)

- HEA Title IV institutions shall-
- “prepare, publish, and distribute”
- “an annual security report containing...information with respect to the ***campus security policies*** and campus crime statistics of that institution”
- By October 1, Notice Required
- MARKET!!!
 - Press Release, Social Media...



Where the Clery Act Began

- Brochure circulated by Connie & Howard Clery to prospective students in 1988
- Getting answers was difficult
- Goal was transparency
- Complicated by bureaucracy
- After law passed many students unaware of formal report - Gregory, D. E. & Janosik, S. M. (2002)

**College Security Questionnaire
For Parents and Students**

Institution: _____ Date: _____
Respondent: _____ Title: _____

During the past 3 years, how many felonies were committed on campus?

Number of rapes _____
Number of robberies _____
Number of assaults _____
Number of burglaries _____
Number of homicides _____
Number of criminal trespasses _____

Is this information regularly disseminated to parents and students each year?

How many campus police and security personnel are there? _____

How many students live on campus? _____

Ratio of students to campus police and security personnel. _____

Dormitories have security personnel stationed at the entrance on a 24-hour basis?

Administration log kept of non-resident students entering the dorm. _____

Are security personnel trained professionals? _____

Are security personnel semi-trained students? _____

Do security personnel conduct random patrols of the campus? _____

Do security personnel enter and search dormitories? _____

YES/NO

Do all dormitory doors lock automatically? _____

Do dormitory doors have electronic alarms to warn of propped doors? _____

Are single sex dormitories available to all students on demand? _____

Does Admissions Application ask about any prior felony convictions? _____

Are prospective students tested during their physical exams for alcohol and drug dependency? _____

Are students expelled for drug use on campus? _____

Are underage state liquor laws vigorously enforced by campus police? _____

Can a student get another room or roommate promptly, if their roommate is engaged in sex or using drugs in the dorm room? _____

What administrator do they petition if they have the problem mentioned in the preceding question? _____

COMMENTS: _____

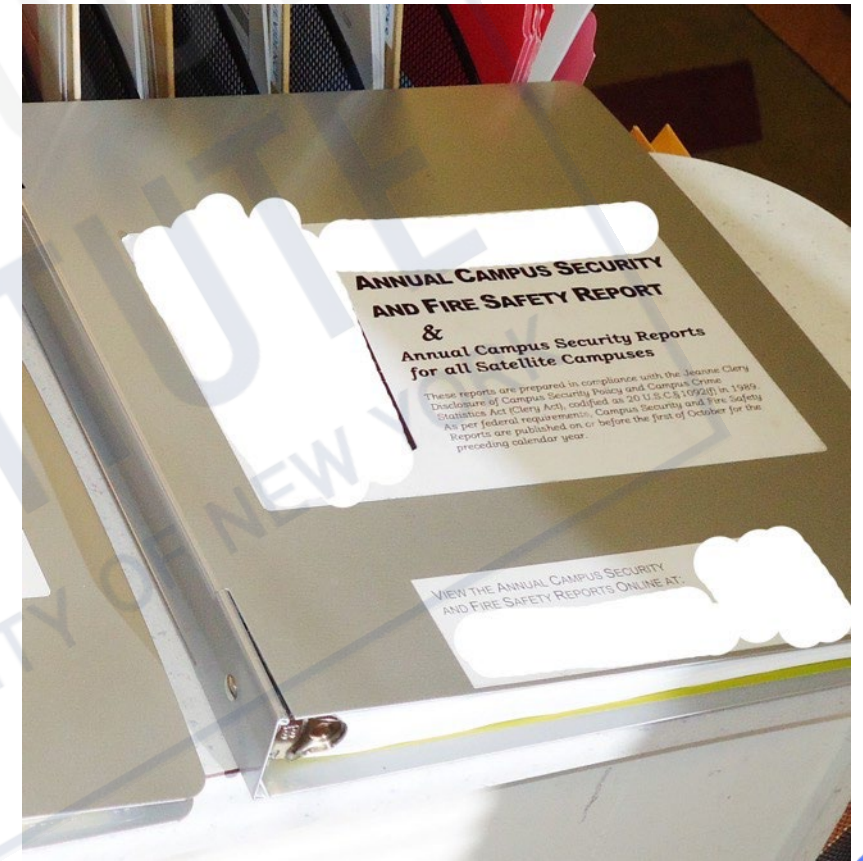
Please return this completed questionnaire to: _____

(PHOTO COPY FOR EXTRA COPIES)

The Challenge

Former Boston Police Commissioner Ed Davis, Campus Safety Magazine, March 11, 2020

- “What started in 1998 as a report of 20 or so pages has evolved as the Act has expanded, to typically more than 100 pages of dense information. It requires vague data that is difficult for even an expert to comprehend. Worse, the report offers little perspective that would allow a reader to evaluate current safety concerns on campus — it resembles the terms and conditions that pop up each time you access a site online.”



“A statement of *current* campus policies”

The Handbook for Campus Safety and Security Reporting, 2016 Edition



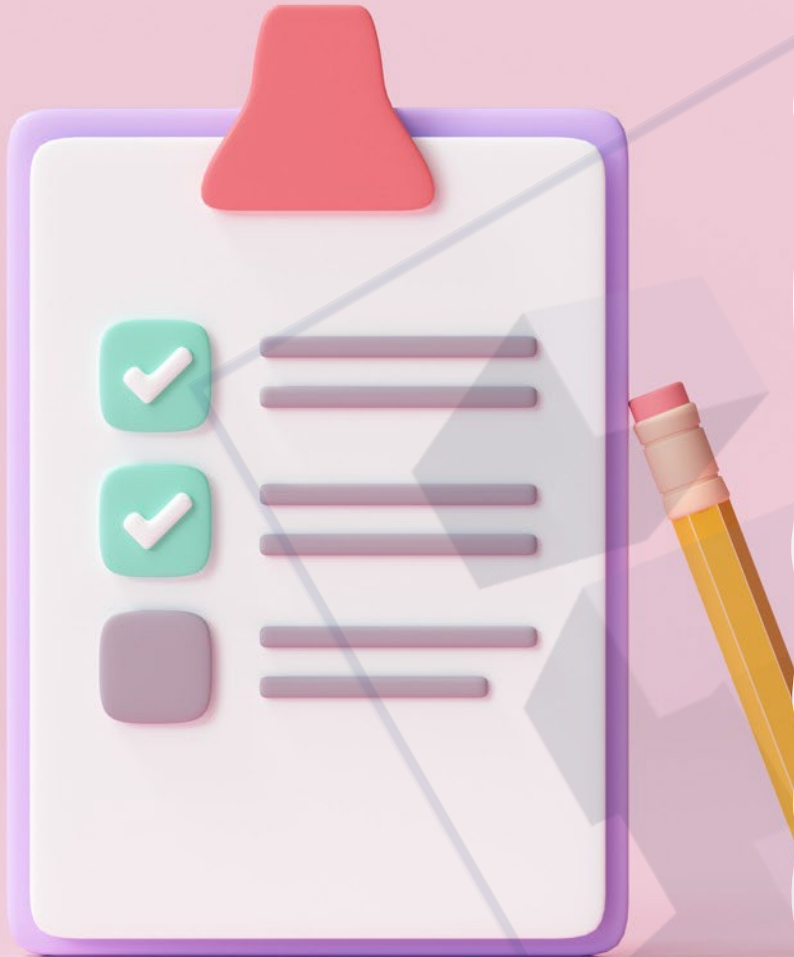
- “Use language that will be understood by the general public (i.e., avoid heavily legal language).”
- “*say what you do and do what you say*”
- Remember intended audience is a 17-year-old high school senior, or undergraduate

Why should we do this?

- We put a lot of time, effort, and resources into Clery “compliance”.
- A tool our campus communities can actually use should be the result.
- ***Campus Safety Handbook***
- The teamwork put into it will strengthen campus safety stakeholder relationships and policies.



Clery Annual Report – The Campus Safety FAQ



- Re-envision the ASR
 - “Annual Campus Safety Report”
- Campus Safety Frequently Asked Questions Approach
- Question-by-Question
 - Per Regulations (Checklist)
- Brief Answers
- Be Useful & Accessible, Not Glitzy

Include

- What a campus community member should do
- Who they should contact
- What they should expect from the institution



Writing or Revising Your ASR

Begin Months In Advance



- ***Start Now***
- This is a job for the Clery Committee
- Led by Clery Coordinator
- Multidisciplinary
- *Assisted by SAFE Campuses, LLC*
- Assisted by Public/Government Relations, Grant Writer
- *There is no one size fits all template*



The Handbook
for Campus Safety
and Security Reporting
2016 Edition



Checklist for Campus Safety and Security Compliance

- *The Handbook for Campus Safety and Security Reporting, 2016 Edition*
- **Appendix C**
 - Rescinded but may rely upon
- Also refer to 34 CFR § 668.46
- *This session will not address every required element, so this checklist is essential reading.*

Group Exercise One – Who do you bring to the table?

- Who, by role, from your institution do you want involved in contributing to the ASR?



Crime & Emergency Reporting

Checklist Pages C-6 & C-7
20 USC § 1092(f)(1)(A)

- Campus Public Safety
 - Written Directive/SOP
- Student Affairs
 - Student Conduct
- Human Resources
- Title IX
 - Sexual Misconduct Policy
- Institutional Clery Policy/Other
- *Voluntary, Confidential Reporting*



Sample Crime Reporting Statement

A handout version has been provided

- [Institution] encourages the prompt and accurate reporting of crimes to law enforcement when the victim elects to. Individuals should report to [Public Safety Department] or the local law enforcement agency for where the offense occurred. If a victim is unable to make a report, including due to incapacitation, [Institution] encourages community members to seek emergency assistance including making a report to law enforcement.
- [Public Safety Department] can be contacted by calling XXX-XXX-XXXX or by dialing 911. You can also report in person at [Public Safety Address] or by speaking with any officer on patrol. Please visit [Web Address] for additional information.

Sample Crime Reporting Statement

An institution can include additional preferred reporting options

- You can also report to the [Institution] Title IX Coordinator at [Office Address], or by calling XXX-XXX-XXXX. A written complaint can be submitted to [E-Mail Address] or by completing an Incident Reporting Form at [Web Address]. Reports made to the Title IX Coordinator will not initiate a law enforcement investigation but they can provide assistance to victims of sexual misconduct including with reporting to law enforcement and in accessing the sexual misconduct disciplinary proceeding process.
- [Institution] does not have a policy for the voluntary, confidential reporting of crime for the purposes of inclusion in annual crime statistics nor a policy for encouraging counselors to refer those they are counseling to such a program. Under the Clery Act crimes reported to counselors are exempt from reporting.





Break

Up Next – General Campus Safety Policies

Timely Warnings

Prep. For Group Exercise Two
20 USC § 1092(f)(3)

- Clery reportable crime
- Institution considers a threat to students & employees
- Aid in prevention of similar crimes
- Keeps victim identity confidential
- *As soon as the “pertinent information” is available*
- *Not required if Emergency Notification issued*

Group Exercise Two – Timely Warning Summary

- Review complete policy for 10 minutes
 - Chapter 19, pages 7-9
- Draft a summary for 10 minutes
 - 300 words or less
- Report out for 10 minutes



Facilities Safety

Checklist Page C-7

20 USC § 1092(f)(1)(B)

- Security of & access to
 - Residences
- Maintenance

Law Enforcement

Checklist Page C-7

20 USC § 1092(f)(1)(C)

- Does your campus public safety have authority to arrest?
- Is this per state law, MOU, etc...?
- How do you work with local law enforcement?
- Formal MOU for investigating crimes? (Can simply say no)
- Monitoring student org. noncampus properties (say if none)
- Registered sex offender information link (Page C-11)





Inquiring Minds

- Which offices/departments offer crime prevention programming?
 - Public Safety
 - Residence Life
 - Greek Life
 - Athletics
 - HR
 - Student Affairs
 - Health Educators
 - Others



Prevention Programming

Checklist Page C-7

20 USC § 1092(f)(1)(D)-(E)

- Programming from across your campus
 - Public Safety, Residence Life, Greek, Athletics
- Don't inventory all programs offered last year
- Type & frequency
 - Orientation, once per semester, on request

A photograph of four glasses of beer on a wooden tray, arranged in a row. The glasses contain different types of beer, ranging from dark to light. The tray is set on a dark wooden surface.

Alcohol & Other Drugs

Checklist Pages C-7 & C-8

20 USC § 1092(f)(1)(H)

- Explain institutional policies for alcohol use
- Enforcement procedures for
 - Underage drinking laws
 - Use & sale of illegal drugs
- May cross-reference “Drug-Free Schools and Communities Act of 1989” Materials (ASR alone won’t meet dissemination requirement for those)

Emergency Response & Evacuation

Checklist Page C-5

20 USC § 1092(f)(1)(J)

- How & who issues emergency notifications?
- *Include the “verbatim” statement:*
- “the institution will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency”





Emergency Response & Evacuation

Checklist Pages C-5 & C-6

20 USC § 1092(f)(1)(J)

- Explain what campus community should expect
- Explain evacuation procedures (building maps, rally points, etc...)
- Required – Testing Annual Procedures
 - Entire response & evacuation procedure not just notification
- Document each test
- Required – Publicizing emergency response information

Missing Student Notification Procedures

Checklist Pages C-12 & C-13, and Sample
Policy Statement
20 USC § 1092(j)

- How to report a missing student
- Immediate referral to campus public safety, or if none local law enforcement
- Residential students may register a **Confidential Contact**
- Confidential contact & local police notified if student determined missing
 - Custodial parent/guardian notified if under 18 & not emancipated



Inquiring Minds

- Will changes to Title IX regulations be reflected in your ASR?
 - Yes
 - No
 - No, never subject to 2024 Title IX Rule



A photograph of a classical statue of Lady Justice, blindfolded and holding scales, standing on the roof of a building with ornate architectural details. The background is a clear blue sky.

Violence Against Women Act

Checklist Pages C-8 to C-11

20 USC § 1092(f)(8)

- Preventing, reporting, and disciplinary proceedings
- Sexual assault, dating violence, domestic violence, stalking
- Intersects with Title IX
- Largest section of ASR



Reporting VAWA Offenses

Checklist Pages C-8 & C-9

20 USC § 1092(f)(8)(B)(iii)

- Emphasize support for victims/survivors
- *Be trauma informed*
- *Be easily understood, avoid legalese*
- What accommodations will be offered
- Preserving evidence
- Right to assistance reporting to law enforcement
- Right to not report to law enforcement
- Will be provided with written summary of rights & options

Preventing VAWA Offenses

Checklist Page C-8

20 USC § 1092(f)(8)(B)(i)

-
- Educational Programming
 - New students AND employees
 - May be online
 - Ongoing Education
 - Bystander Intervention
 - Risk Reduction
 - State definitions of VAWA Offenses, Consent



VAWA Disciplinary Proceedings

- A plain language summary of your Title IX & other sexual misconduct policies
- **Ensure that complainants, respondents, and their advisors know what to expect**
- ***Be trauma informed for both complainants and respondents***
- Provide equal resources for both complainants and respondents
- Must be accurate, the Ed. Dept. will treat disclosures as if they are a part of your policies

VAWA Disciplinary Considerations

- Not the same as Title IX
- Limited to crimes – sexual assault, dating violence, domestic violence, and stalking
- No limit on location, on or off-campus, including outside the United States
 - 20 USC § 1092(f)(8)(C)
- Any sexual misconduct policy must include Clery requirements as well as Title IX



VAWA Disciplinary Proceedings

Checklist Pages C-9 & C-10

20 USC § 1092(f)(8)(B)(iv)

- Describe each type of proceeding
 - Student, staff, faculty, union...
- Standard of evidence
- “provide a prompt, fair, and impartial investigation and resolution” - 20 USC § 1092(f)(8)(B)(iv)(aa)
- “from the initial investigation to the final result” – 34 CFR § 668.46(k)(2)(i)
- Complainant & respondent have equal rights
- Simultaneous written notifications

Hazing

Due by October 1, 2026

- How to report
- Investigate
- Standards of conduct (required by July 1, 2025)
- Enforcement of laws
- Prevention & awareness
- PL 118-173, December 23, 2024

cleryquestions@safecampuses.biz

