

TCSG Clery Act Compliance: College Unit Roles & Responsibilities*

COLLEGE CLERY ACT COMPLIANCE TEAM

- Review College Clery Act Compliance standard operating procedures annually
- Review charge of College Clery Act Compliance Team annually
- Ensure representative Team composition
- Convene regular, timely Team meetings
- Participate in TCSG System Office Clery Act Compliance Team events
- Produce & archive Team agendas, minutes & membership rosters
- Provide on-going, appropriate Team training
- Confirm College Clery Crime Statistics
 - Verify accurate classification
 - Validate precise counting
 - Ensure complete collection
- Verify all required College-wide ASR/ASFSR Policy Statements
 - Ensure each required policy statement is disclosed
 - Address each component of each required policy statement
 - Evaluate & verify College implementation of each required policy statement
 - Present policy statements in language understood by general public in ASR or ASFSR
 - Substantiate required policy statements are accurately represented in current College procedures, policies &/or practices (for each separate campus, if indicated)
- Educational Programs & Campaigns
 - Compile & archive comprehensive College-wide summary reports of educational programs & campaigns, addressing the following:
 - Type
 - Frequency or timing
 - Intended audience(s)
 - Develop multiple strategies throughout year to address all audiences
 - Provide primary prevention & awareness educational programs as well as on-going prevention & awareness campaigns to address dating violence, domestic violence, sexual assault & stalking
- Complete formative & final reviews of Annual Security Report (ASR) or Annual Security & Fire Safety Report (ASFSR)
- Submit reviewed & promulgated ASR/ASFSR to TCSG System Office annually by Sept-1
- Archive ASR/ASFSRs & accompanying administrative files properly (7 years)
- Assemble & submit ASR/ASFSR Clery crime statistics to US Department of Education (ED) annually by approximately Oct-15
- Assemble & submit Clery fire statistics (if applicable) to ED annually by approximately Oct-15
- Publish & distribute ASR/ASFSR by Oct 1 to the following:
 - All current students & all current employees
 - Prospective students & prospective employees

COLLEGE POLICE OR SECURITY

- Submit reviewed & promulgated ASR/ASFSR to TCSG System Office annually by Sept-1
- Assemble & submit ASR/ASFSR Clery crime statistics to ED annually by approximately Oct-15
- Assemble & submit Clery fire statistics (if applicable) to ED annually by approximately Oct-15
- Produce, maintain & archive the Daily Crime Log & make it appropriately available
- Validate Criminal/Clery/VAWA definitions in ASR/ASFSR

- Evaluate & revise College Clery Geography each January 1 & July 1 & when buildings or properties are added or removed
- Ensure production, review & archiving of College Clery Maps corresponding to current College Clery Geography
- Disseminate & archive communications to appropriate local law enforcement jurisdictions, requesting Clery crimes annually at minimum
- Disseminate & archive communication to Campus Security Authorities (CSAs) requesting unreported Clery crimes, annually at minimum
- Ensure a digital CSA report form is accessible on College police or security webpage
- Create & archive audits of Clery crime & student discipline referral statistics to support, or counter, inclusion in Clery Statistics
- Archive copies of Clery crime reports
- Produce & archive records of discharge of arrests & referrals for disciplinary action
- Document & archive the following:
 - Key communications with & responses from Clery Act Compliance Team members
 - Communications sent to local law enforcement jurisdictions & responses
 - Communications with hotels or jurisdictions for noncampus Clery geography
 - Communications to & from CSAs
 - Copies of ASR/ASFSR availability notices to current students & current employees
 - Training records of Clery Act Compliance Team members & CSAs
- Immediate (Emergency) Notifications & Timely Warning Reports
 - Promulgate Communication Authority & Communication Protocol
 - Complete Decision Matrices for all Clery crimes to justify decisions to send or not send
 - Detail & archive Decision Matrices for all Immediate (Emergency) Notifications
 - Detail & archive Decision Matrices for all Timely Warning Reports
- Fire Safety Disclosures (Residence Halls)
 - Produce Fire Safety Log
 - Compile Fire Statistics
 - Produce & publish ASFSR (may be combined with ASR)
 - Identify Fire Institutional Official
- Document & archive Missing Student Protocols (Residence Halls)
- Document College emergency response & evacuation exercises
- Verify all required College-wide ASR/ASFSR Policy Statements
 - Ensure each required policy statement is disclosed
 - Address each component of each required policy statement
 - Evaluate & verify College implementation of each required policy statement
 - Present policy statements in language understood by general public in ASR or ASFSR
 - Substantiate required policy statements are accurately represented in current College procedures, policies &/or practices (for each separate campus, if indicated)
 - Evaluate & ensure implementation of Policy Statements in ASR/ASFSR concerning, but not limited to:
 - Crime reporting
 - Security of & access to College facilities
 - Crime prevention
 - College police &/or security
 - Alcohol & drugs
 - Dating violence, domestic violence, sexual assault & stalking, to include but not limited to:
 - ◆ Primary prevention & awareness educational programs as well as on-going prevention & awareness campaigns
 - ◆ Procedures victims follow if a crime occurs
 - ◆ Information of how confidentiality of victims & other necessary parties protected
 - ◆ Written notification to students & employees about institutional & community services
 - ◆ Written notification to victims about available assistance

- ◆ Procedures for institutional disciplinary action
 - ◆ Written explanation of victim's (student &/or employee) rights & options (on or off campuses)
 - ◆ Obtaining registered sex offender information
 - ◆ Emergency response & evacuation procedures
- Provide educational programs & campaigns
 - College security procedures & practices
 - Confidentiality/anonymity of reporting

HUMAN RESOURCES

- Campus Security Authorities (CSAs)
 - Provide list of all CSAs to Chief/Director by July 1 every year
 - Include CSA designation in job descriptions when appropriate
 - Disseminate & archive communications regularly to CSAs regarding CSA status & responsibilities
 - CSA Training:
 - Provide training for all CSAs
 - Ensure all CSAs participate in training annually at minimum
 - Ensure all new CSAs are oriented & trained
 - Produce & archive CSA training log
 - Archive all CSA training records (7 years)
- Distribute ASR/ASF SR
 - All current employees on Oct-1
 - All prospective employees as interaction occurs, such as during the employment application process
- Report any employee reported/investigated regarding incidents of Clery crimes to Chief/Director (identity not required to ensure correct count)
- Report applicable employee disciplinary procedures for Clery crimes: including hate crimes, VAWA offenses & arrests & disciplinary referrals for violations of weapons, drug abuse & liquor laws to Chief/Director (identity not required to ensure correct count)
- Verify all required College-wide ASR/ASF SR Policy Statements
 - Ensure each required policy statement is disclosed
 - Address each component of each required policy statement
 - Evaluate & verify College implementation of each required policy statement
 - Present policy statements in language understood by general public in ASR or ASF SR
 - Substantiate required policy statements are accurately represented in current College procedures, policies &/or practices (for each separate campus, if indicated)
 - Evaluate & ensure implementation of Policy Statements in ASR/ASF SR concerning, but not limited to:
 - Crime reporting
 - Crime prevention
 - Alcohol & drugs
 - Dating violence, domestic violence, sexual assault & stalking
 - ◆ Primary & ongoing prevention & awareness educational programs & campaigns
 - ◆ Procedures victims follow if crime occurs
 - ◆ Information of how confidentiality of victims & other necessary parties protected
 - ◆ Written notification to students & employees about institutional & larger community services
 - ◆ Written notification to victims about available assistance
 - ◆ Procedures for institutional disciplinary action
 - ◆ Written explanation of victim's (student & employee) rights & options (on or off campuses)
- Educational Programs & Campaigns

- College security procedures & practices
- Alcohol & drugs
- Dating violence, domestic violence, sexual assault & stalking
- Sexual harassment

CAMPUS SAFETY AUTHORITIES (CSAs)

- Maintain & develop understanding of:
 - Clery Crimes: Criminal offenses; Hate crimes; VAWA offenses
 - Arrests & disciplinary referrals for violations of weapons, drug abuse & liquor laws
 - Clery Geography
- Once made aware of a Clery crime, inform the individual of CSA status & duty to report
- Report ALL possible Clery crimes to Chief/Director (identifying information may be withheld if person does not wish to not make a report but other known details of the incident should be reported)
- When possible, use digital CSA Report Form located on the College police/security webpage

STUDENT AFFAIRS

- Disclose, document & archive results of Biennial Review of Drug Free Schools & Communities Act (DFSCA)
- Disclose, document & archive Annual Notification of Drug & Alcohol Abuse Prevention Programs (DAAPP)
- Notify Chief/Director of all student referrals for criminal offenses, hate crimes, VAWA offenses or violations of drugs, alcohol or weapons laws
- Study Abroad Programs
 - Notify Chief/Director of all study abroad programs
 - Identify CSAs & notify HR
 - Ensure CSAs are trained before program begins
- Short Stays Away & Repeated Use of Locations
 - Notify Chief/Director of all “short stays away” (more than 1 overnight stay) &/or repeated use of locations (overnight trip every year & students stay in same hotel each year)
 - Identify CSAs & notify HR throughout year
 - Ensure CSAs trained before stay/use begins
- Student Clubs/Organizations/Activities/Athletics
 - Identify all club/organization/activities sponsors/coaches as CSAs & report to HR throughout year
 - Ensure all CSAs identified above are trained
- Residence Halls:
 - Review & update Fire Safety Disclosures
 - Review Fire Safety Log
 - Review & report Fire Statistics
 - Review & update Annual Fire Safety Report (AFSR); may be combined with ASR
 - Identify RAs & appropriate residence hall staff as CSAs & report to HR through year
 - Ensure timely RA training
 - Document evacuation exercises
- Verify all required College-wide ASR/ASFSR Policy Statements
 - Ensure each required policy statement is disclosed
 - Address each component of each required policy statement
 - Evaluate & verify College implementation of each required policy statement
 - Present policy statements in language understood by general public in ASR or ASFSR
 - Substantiate required policy statements are accurately represented in current College procedures, policies &/or practices (for each separate campus, if indicated)
 - Evaluate & ensure implementation of Policy Statements in ASR/ASFSR concerning, but not limited to:
 - Crime reporting

- Crime prevention
- Alcohol & drugs
- Dating violence, domestic violence, sexual assault & stalking
 - ◆ Primary & ongoing prevention & awareness educational prevention & awareness programs & campaigns
 - ◆ Procedures victims follow if crime occurs
 - ◆ Information of how confidentiality of victims & other necessary parties protected
 - ◆ Written notification to students & employees about institutional & larger community services
 - ◆ Written notification to victims about available assistance
 - ◆ Procedures for institutional disciplinary action
 - ◆ Written explanation of victim's (student & employee) rights & options (on or off campuses)
 - ◆ Disclose procedures for student disciplinary proceedings for violent crime or non-forcible sex offenses
 - ◆ Missing student protocols
- Educational Programs & Campaigns
 - College security procedures & practices
 - Alcohol abuse education programs as required under Section 120(a) through (d) of the HEA DFSCA
 - Dating violence, domestic violence, sexual assault & stalking

ACADEMIC AFFAIRS

- Study Abroad Programs
 - Notify Chief/Director of all study abroad programs
 - Identify all CSAs & notify HR throughout year
 - Ensure CSAs trained before program begins
- Short Stays Away & Repeated Use of Locations
 - Notify Chief/Director of all "short stays away" (more than 1 overnight stay) &/or repeated use of locations (overnight trip every year & students stay in same hotel each year)
 - Identify all CSAs & notify HR
 - Ensure CSAs trained before stay/use begins
- Notify Chief/Director of any changes in written agreements (formal or informal) regarding physical educational locations
- Identify all CSAs (employee & student) associated with physical educational locations & notify HR throughout year
- Verify all required College-wide ASR/ASFSR Policy Statements
 - Ensure each required policy statement is disclosed
 - Address each component of each required policy statement
 - Evaluate & verify College implementation of each required policy statement
 - Present policy statements in language understood by general public in ASR or ASFSR
 - Substantiate required policy statements are accurately represented in current College procedures, policies &/or practices (for each separate campus, if indicated)
 - Evaluate & ensure implementation of Policy Statements in ASR/ASFSR concerning, but not limited to:
 - Crime reporting
 - Crime prevention
 - Alcohol & drugs
 - Dating violence, domestic violence, sexual assault & stalking
 - ◆ Primary & ongoing prevention & awareness educational programs & campaigns
 - ◆ Procedures victims follow if crime occurs
 - ◆ Information of how confidentiality of victims & other necessary parties protected

- ◆ Written notification to students & employees about institutional & larger community services
 - ◆ Written notification to victims about available assistance
 - ◆ Procedures for institutional disciplinary action
 - ◆ Written explanation of victim's (student & employee) rights & options (on or off campuses)
- Educational Programs & Campaigns
 - Crime reporting
 - Crime prevention
 - Dating violence, domestic violence, sexual assault & stalking

ADMINISTRATIVE SERVICES (to include FACILITIES)

- Notify Chief/Director of any newly obtained property, leased or built (consult BLLIP data)
- Maintain active & current College Building/Property List with complete addresses
- Provide to College Building or Property List to police or security each January 1 & July 1 & when College buildings or properties are added or removed
- Evaluate Clery Geography & corresponding Clery Map each January 1 & July 1 & when College buildings or properties are added or removed
 - Verify all required College-wide ASR/ASFSR Policy Statements
 - Ensure each required policy statement is disclosed
 - Address each component of each required policy statement
 - Evaluate & verify College implementation of each required policy statement
 - Present policy statements in language understood by general public in ASR or ASFSR
 - Substantiate required policy statements are accurately represented in current College procedures, policies &/or practices (for each separate campus, if indicated)
 - Evaluate & ensure implementation of Policy Statements in ASR/ASFSR concerning, but not limited to:
 - Security of & access to College facilities
 - Security considerations used in the maintenance of College facilities

TITLE IX

- Notify Chief/Director of all reported incidents as soon as possible to evaluate for Clery crimes count, pattern of criminal acts, Clery required notifications (name of persons involved not necessary)
- Provide victim/complainant with Rights & Options pamphlet & offer to bring to College police/security if they would like to discuss options about reporting to law enforcement
- Verify all required College-wide ASR/ASFSR Policy Statements
 - Ensure each required policy statement is disclosed
 - Address each component of each required policy statement
 - Evaluate & verify College implementation of each required policy statement
 - Present policy statements in language understood by general public in ASR or ASFSR
 - Substantiate required policy statements are accurately represented in current College procedures, policies &/or practices (for each separate campus, if indicated)
 - Evaluate & ensure implementation of Policy Statements in ASR/ASFSR concerning, but not limited to:
 - Crime reporting
 - Crime prevention
 - Alcohol & drugs
 - Dating violence, domestic violence, sexual assault & stalking
 - ◆ Primary & ongoing prevention & awareness educational programs & campaigns
 - ◆ Procedures victims follow if crime occurs
 - ◆ Information of how confidentiality of victims & other necessary parties protected
 - ◆ Written notification to students & employees of institutional & larger community services

- ◆ Written notification to victims about available assistance
- ◆ Procedures for institutional disciplinary action
- ◆ Written explanation of victim's (student & employee) rights & options (on or off campuses)
- Educational Programs & Campaigns
 - Crime reporting
 - Crime prevention
 - Dating violence, domestic violence, sexual assault & stalking

COLLEGE EXECUTIVE LEADERSHIP

- Review College Clery Act standard operating procedures annually
- Review College Clery Act Compliance Team charge annually
- Appoint College Clery Act Compliance Team Chair & Team members
- Immediate (Emergency) Notifications & Timely Warning Reports
 - Stipulate & promulgate Emergency Communication Protocol including delegation of authority
 - Complete Decision Matrices for all Clery crimes to justify decisions to send or not send
 - Provide copies of all Immediate (Emergency) Notifications, Timely Warning Reports & completed Decision Matrices to Chief/Director of police/security

TCSG SYSTEM OFFICE CLERY ACT COMPLIANCE TEAM

- Review SBTCSG Procedure 3.4.1p5 Procedure - Clery Act Compliance at least annually
- Create work plan for implementation of compliance of individual TCSG System Office unit responsibilities for & support of respective College units
- Provide technical assistance to respective College units
- Promote College Clery Act Compliance Teams activities
- Establish & implement review & assessment processes for ASR/ASF SRs

Citation: "The Handbook for Campus Safety and Security Reporting" 2016 Edition, U.S. Department of Education, Office of Postsecondary Education; <https://www2.ed.gov/admins/lead/safety/handbook.pdf>

*Also refer to "TCSG Clery Act Compliance: College Clery Act Compliance Team Activity Guide" document.

Disclaimer: This document is provided as general guidance.

Updated January 2022