

TCSG Clery Act Compliance: College Unit Roles & Responsibilities*

COLLEGE CLERY ACT COMPLIANCE TEAM

- Review charge of College Clery Act Compliance Team annually
- Ensure representative Team composition
- Convene regular, timely Team meetings
- Produce & archive Team meeting agendas, minutes & attendance rosters
- Provide on-going, applicable Team training
- Review College Clery Act compliance policies, procedures & practices concerning the preparation, publication, distribution & archiving of the ASR/ASFSR annually
- Confirm College Clery Act Crime Statistics
 - Verify accurate classification
 - Validate precise counting
 - Ensure complete collection
- Validate all required Institution-wide ASR/ASFSR policy statement disclosures
 - Ensure each required policy statement is disclosed & each component is addressed
 - Evaluate & verify Institution-wide implementation of each required policy statement
 - Present policy statement disclosures in language understood by general public in ASR or ASFSR
 - Substantiate required policy statements are accurately represented in current College policies, procedures & practices (for each separate campus, if required)
- Support Educational Programs & Campaigns
 - Compile & archive comprehensive College-wide summary reports of educational programs & campaigns, addressing the following conditions:
 - 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
 - Maintain annual College logs
- 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 Act crime statistics to US Department of Education (ED) annually by approximately Oct-15
- Assemble & submit Clery Act fire statistics (if applicable) to ED annually by approximately Oct-15
- Publish & distribute ASR/ASFR by Oct 1 to the following groups:
 - All current students & all current employees
 - Prospective students & prospective employees

COLLEGE POLICE AND/OR SECURITY

- Submit reviewed & promulgated ASR/ASFSR to TCSG System Office annually by Sept-1

- Assemble & submit ASR/ASFSR Clery Act crime statistics to ED annually by approximately Oct-15
- Assemble & submit Clery Act 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 & whenever buildings or properties are added or removed
- Ensure production, review & archiving of College Clery Maps corresponding to contemporary College Clery Geography
- Disseminate & archive communications to external law enforcement jurisdictions, requesting Clery Act crimes reports, annually at minimum
- Disseminate & archive communications to Campus Security Authorities (CSAs) requesting unreported Clery Act crimes & arrests and referrals for drug, liquor, and weapon law violations, annually at minimum
- Ensure a digital CSA report form is accessible on College police or security webpage
- Complete & archive internal audits of Clery Act crime reports & student & employee discipline referrals to support, or counter, inclusion in Clery Act crime statistics
- 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 external 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
- Emergency Notifications & Timely Warnings
 - Promulgate Emergency Communications Delegation of Authority & Emergency Communications Protocol
 - Complete Decision Matrices for all Clery Act crimes to justify decisions to transmit or not to transmit
 - Detail & archive Decision Matrices for all Emergency Notifications
 - Detail & archive Decision Matrices for all Timely Warnings
- Fire Safety Disclosures (On Campus Student Housing)
 - Produce Fire Safety Log
 - Compile Clery Act Fire Statistics
 - Produce & publish ASFSR (may be combined with ASR)
 - Identify Institutional Fire Official and establish credentials
- Document & archive Missing Student Protocols (On Campus Student Housing)
- Document College emergency response & evacuation exercises
- Validate all required Institution-wide ASR/ASFSR policy statement disclosures:
 - Ensure each required policy statement is disclosed & each component is addressed
 - Evaluate & verify Institution-wide implementation of each required policy statement
 - Present policy statement disclosures in language understood by general public in ASR or ASFSR
 - Substantiate required policy statements are accurately represented in current College policies, procedures & practices (for each separate campus, if required)
 - 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 and support 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
 - Incorporate CSA designation in job descriptions where appropriate
 - Disseminate & archive communications regularly to CSAs regarding CSA status & responsibilities
 - CSA Training
 - Provide training for all identified 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)
- Endure distribution of ASR/ASF SR
 - All current employees on Oct-1
 - All prospective employees as interaction occurs, such as during the employment application process
- Report Clery Act crime reports or investigations, including hate crimes, VAWA offenses & arrests & disciplinary referrals for violations of weapons, drug abuse & liquor laws (identity of persons not required to ensure correct count)
- Validate all required Institution-wide ASR/ASF SR policy statement disclosures:
 - Ensure each required policy statement is disclosed & each component is addressed
 - Evaluate & verify Institution-wide implementation of each required policy statement
 - Present policy statement disclosures in language understood by general public in ASR or ASF SR
 - Substantiate required policy statements are accurately represented in current College policies, procedures & practices (for each separate campus, if required)
 - 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)
- Support Educational Programs & Campaigns
 - College security procedures & practices
 - Alcohol & drugs
 - Dating violence, domestic violence, sexual assault & stalking
 - Sexual harassment

CAMPUS SECURITY AUTHORITIES (CSAs)

- Maintain & develop understanding of:
 - Clery Act 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 Act crime, inform the individual of CSA status & duty to report
- Report ALL possible Clery Act 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)
- Whenever possible, use digital CSA Report Form located on the College police/security webpage

STUDENT AFFAIRS

- Review College policies, procedures & practices concerning Biennial Review of the Drug Free Schools & Communities Act (DFSCA)
- Disclose, document & archive results of College Biennial Review of the DFSCA
- Review College policies, procedures & practices concerning assessment & distribution of the Annual Notification of Drug & Alcohol Abuse Prevention Programs (DAAPP)
- Review, disclose, document & archive College Annual Notification of the DAAPP
- Report Clery Act crime reports or investigations, including hate crimes, VAWA offenses & arrests & disciplinary referrals for violations of weapons, drug abuse & liquor laws (identity not required to ensure correct count)
- 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/trainers as CSAs & report to HR throughout year
 - Ensure all CSAs identified above are trained
- On Campus Student Housing:
 - Review & update Fire Safety policy statement disclosures
 - Review & report Fire Statistics
 - Review & maintain Fire Safety Log
 - Review & update Annual Security & Fire Safety Report (ASFSR); may be combined with ASR
 - Identify RAs & appropriate on campus student housing staff as CSAs & report to HR throughout year
 - Ensure timely RA training
 - Conduct & document emergency training, drills & exercises
- Validate all required Institution-wide ASR/ASFSR policy statement disclosures:

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 - Alcohol & drugs
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 - ◆ 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
- Support 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
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 - ◆ 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)
- Support 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 College buildings or property, leased or built (consult BLLIP data)
- Maintain current College Building & Property List with complete addresses
- Provide College Building & Property List to College Clery Team each January 1 & July 1 & whenever College buildings or properties are added or removed
- Evaluate Clery Geography & corresponding Clery Map each January 1 & July 1 & whenever College buildings or properties are added or removed
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 - 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 student & employee incidents as soon as possible to evaluate for Clery Act crimes count, pattern of criminal acts & Clery required notifications (identity of persons not required to ensure correct count)
- Provide victim/complainant with Rights & Options pamphlet & offer to bring individual to College police/security if they would like to discuss options about reporting to law enforcement
- Validate all required Institution-wide ASR/ASFSR policy statement disclosures:
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- Support Educational Programs & Campaigns
 - Crime reporting
 - Crime prevention
 - Dating violence, domestic violence, sexual assault & stalking

COLLEGE EXECUTIVE LEADERSHIP

- Review College Clery Act policies, procedures & practices annually
- Review charge of College Clery Act Compliance Team annually
- Appoint College Clery Act Compliance Team Chair & Team members
- Emergency Notifications & Timely Warnings
 - Stipulate & promulgate Emergency Communications Delegation of Authority and Emergency Communications Protocol
 - Complete Decision Matrices for all Clery Act crimes to justify decisions to transmit or not to transmit
 - Provide copies of all Emergency Notifications, Timely Warnings & 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
Develop 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/ASFSRs

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.

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