

TCSG Clery Act Compliance: College Clery Act Compliance Team Activity Guide*

January

Suggested Team Actions

- Clery Act Crimes
 - Review records of Clery Act crimes for previous calendar year
 - Produce audit trail of all reports of Clery Act crimes received including sources other than College police or security
 - Send requests for Clery Act crime statistics to all Campus Security Authorities (CSAs) for previous calendar year
 - Send requests to external law enforcement agencies requesting Clery Act crime statistics for each campus; public property surrounding each campus; & noncampus locations (study abroad, short stay away and repeated use locations) for previous calendar year
 - Collect Clery Act fire statistics for on campus student housing for previous calendar year
- Campus Security Authorities (CSAs)
 - Update list of CSAs for new calendar year
 - Archive list of all CSAs for previous calendar year
- Clery Geography
 - Develop/update Clery Maps
 - Update College buildings & properties inventory
 - Examine noncampus & public property aspects
 - Assess “short stay away” events, study abroad programs & repeated use locations
- Issue written requests for number/descriptions of emergency “tests”— i.e. drills and exercises coordinated for the calendar year

Suggested Team Agenda Topics

- College Clery Act Compliance Team Organization (Refresh at least annually)
 - Establishing regular meeting schedules
 - Determining representative Team composition
 - Determining roles and responsibilities (Chair etc.)
 - Generating and retaining records (agendas, minutes)
 - CSA Training for all Team members
 - Appraising “TCSG Clery Act Compliance: College Unit Roles & Responsibilities” document

February

Suggested Team Actions

- Review of the following records with regard to Clery Act crimes and disciplinary actions for the previous calendar year and submit an audit trail for these records
 - Student Code of Conduct records
 - employee disciplinary actions of Clery Act crimes from Human Resources
 - Title IX student & employee records

Suggested Team Agenda Topics

- Campus Security Authorities (CSAs)

- Confirming CSA identification at least twice annually and as needed periodically
- Training CSAs
 - Annual training for returning CSAs
 - Training for new CSAs
 - Provision for “just in time” training for CSAs with episodic Clery Act responsibilities
 - Archiving training records
- Determining CSA College roles & responsibilities
- Collecting Clery Act crime statistics
- Developing and maintain digital reporting instrument/website mentions
- Verifying College records retention

March

Suggested Team Actions

- Review College Drug and Alcohol Abuse Prevention Program to ensure compliance with Drug-Free Schools and Communities Act (DFSCA)
- Request appropriate employees to compare records and ensure all Clery Act crime reports are recorded, counted and classified correctly; provide audit trail for the security/public safety/police records and judicial records

Suggested Team Agenda Topics

- Clery Geography
 - Developing and updating Clery Maps
 - Examining noncampus, separate campus locations and public property aspects
 - Assessing “short stay away” events, study abroad programs & repeated use locations
- Student Housing Requirements (if applicable)
 - Identifying and training all student housing staff & resident assistants qualifying as CSAs
 - Defining missing persons reporting protocols
 - Assessing the Annual Security & Fire Safety Report (ASFSR) and Fire Log

April

Suggested Team Actions

- Address current Clery Act/VAWA/Title IX/HEA updates
- Review ED fining activity and monitoring lessons learned
- Examine institutional related procedures and practices, such as creating forms and protocols to document & track activities (noncampus written agreements, athletics, student organization travel, etc.)

Suggested Team Agenda Topics

- Clery Act Crimes
 - Classifying Clery Act Crimes
 - Assessing state laws/local ordinances for liquor, drug and weapon law offenses and VAWA offenses
 - Assessing hate crimes and categories of bias
 - Determining unfounding of crimes
 - Clarifying confidential reporting
 - Describing FERPA, HIPPA, PII implications

May

Suggested Team Actions

- Gather information & update annual logs about crime prevention, security awareness, safety education programs

and campaigns including alcohol education, sexual offense prevention

Suggested Team Agenda Topics

- **Timely Warnings (TWs)**
 - Making TWs to members of the College community regarding the occurrence of Clery Act crimes
 - Providing TWs to students and employees in a manner that is timely, that withholds the names of victims as confidential, and that will aid in the prevention of similar occurrences
 - Reviewing circumstances for which a TW will be issued & summary documentation of decision processes
 - Verifying individuals/offices responsible for issuing TWs & writing content
 - Confirming manner in which the TW will be disseminated
 - Evaluating TWs with respect to Clery Act crimes reported to a pastoral &/or professional counselor
- **Emergency Notifications**
 - Reviewing Emergency Notification requirements
 - Verifying College policies & procedures for issuance, responsible party for writing content and method of distribution

June

Suggested Team Actions

- Assess previous year's ASR or ASFSR
- Prepare & review ASR or ASFSR draft to ensure statistics and policy statement disclosures published accurately.
- Request written, documented response from each unit, with suggested changes or indication that no changes are necessary
- Re-send request for Clery Act crime statistics to all CSAs as needed
- Re-send written requests to external law enforcement agencies requesting Clery Act crime statistics for each campus; public property surrounding each campus; noncampus locations as well as study abroad and short stay away locations as needed
- Gather Clery Act fire statistics for on campus student housing

July

Suggested Team Actions

- Update list of CSAs
- Initiate training for all (new and returning) CSAs
- Update list of all addresses and locations owned and controlled by the institution, including non-campus properties and separate campuses

August

Suggested Team Actions

- Re-submit request for Clery Act crime statistics to all CSAs
- Re-submit written requests to external law enforcement agencies not previously responded to requesting Clery Act crime statistics for previous calendar year for each campus; public property surrounding each campus; noncampus locations as well as study abroad, short stay away & repeated use locations
- Send correspondence to counseling unit encouraging providing client information of the "confidential reporting" options available on campus

September/October

Suggested Team Actions

- Submit Clery Act Crime Statistics & Clery Act Fire Statistics to Department of Education
- Prepare for and promulgate distribution of compliance documents or notice of availability
 - current students/employees
 - prospective students/employees

November/December

Suggested Team Actions

- Prepare, review and document Annual Summary of College Clery Act Compliance Team Actions

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 Unit Roles & Responsibilities” document.

Disclaimer: This document is provided as general guidance.

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