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Clery Act Fundamentals: Methods to Assist with Compliance and Increase Student Safety

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Learning objectives

After attending this session, you will be able to:

1. Recognize fundamental Clery Act compliance requirements
2. Describe risks, controls, and assurance and advisory techniques in support of Clery Act compliance
3. Develop an approach for assessing Clery Act compliance

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Content warning

In support of trauma-informed communications, please be aware that this presentation contains information on sensitive topics, such as crimes of violence, including sexual assault, hate crimes, and relationship violence.

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Agenda

1. Background on Clery Act
2. Fundamental Clery Act requirements
3. Key risks, controls, and assessment techniques
4. Participant Exercise: Develop an approach for assessing Clery Act compliance
5. Questions and discussion

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Poll #1

What is your level of knowledge of the Clery Act?

1. I don't know anything about it
2. I know the basics
3. I am moderately knowledgeable
4. I am very knowledgeable

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This is Jeanne Clery.



Jeanne was a college student at Lehigh University.

In 1986, Jeanne was raped and murdered in her residence hall room by another student she did not know.

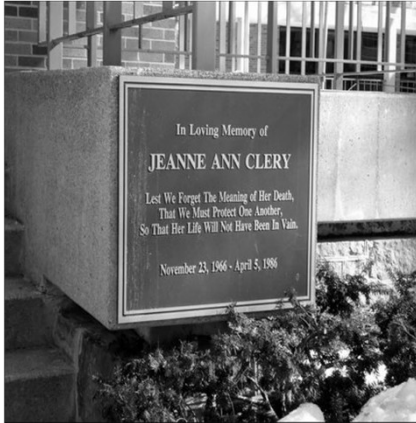
Her parents believe she would have been more cautious if she had known about other violent crimes at Lehigh.

Her parents campaigned for legislative reform. Their efforts resulted in the passage of the Clery Act.

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What is the purpose of the Clery Act?



- Promotes awareness
- Enhances campus safety
- Encourages reporting

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You might be thinking...

- Clery is a “police issue.”
- Clery is just an annual report.
- Clery has nothing to do with me.

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These are all misconceptions.

- ~~Clery is a “police issue.”~~
- ~~Clery is just an annual report.~~
- ~~Clery has nothing to do with me.~~

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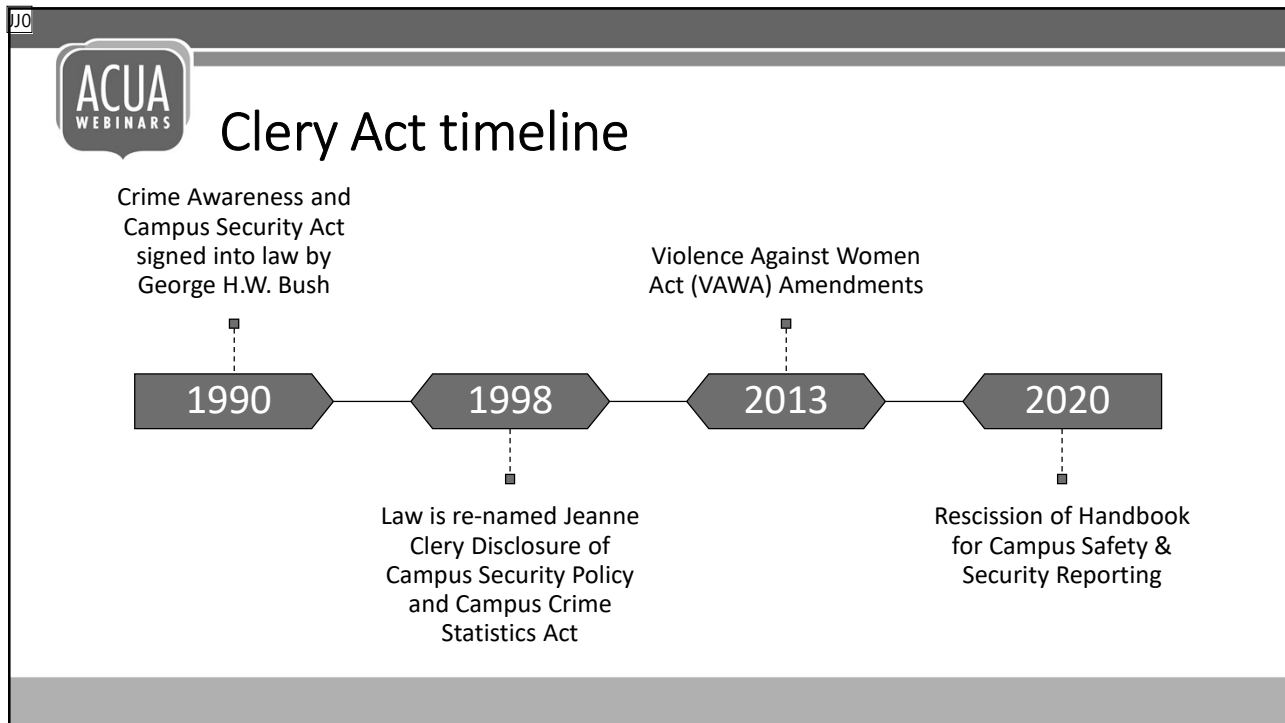
The Clery Act is an institutional obligation with daily, ongoing, and annual components

- Collect, classify, and count crime statistics
- Publish and distribute an Annual Security Report (ASR) and an Annual Fire Safety Report (AFSR)
- Submit crime statistics to the Department of Education
- Issue timely warnings & emergency notifications
- Maintain a daily crime log (and a fire log)
- Implement certain missing student notification policies and procedures
- Implement certain Violence Against Women Act (VAWA)-related policies and procedures
- Provide certain VAWA-related educational programs

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Criminal Offenses	VAWA Offenses	Arrests and Referrals	Hate Crimes
<ul style="list-style-type: none"> •Murder and Non-negligent manslaughter •Manslaughter by negligence •Rape •Fondling •Statutory Rape •Incest •Robbery •Aggravated Assault •Burglary •Motor Vehicle Theft •Arson 	<ul style="list-style-type: none"> •Dating Violence •Domestic Violence •Stalking •Sexual Assault <small>KHO</small> 	<ul style="list-style-type: none"> •Liquor law violations •Drug law violations •Illegal weapons possession 	<p><i>Criminal offenses + larceny-theft, simple assault, intimidation, destruction-damage- vandalism motivated by:</i></p> <ul style="list-style-type: none"> •Race •Gender •Gender identity •Religion •Sexual orientation •Ethnicity •National origin •Disability

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Poll #2

What is the purpose of the Clery Act?

1. Promote awareness
2. Enhance campus safety
3. Encourage reporting
4. All of the above

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Main types of Clery Act risks

Clery Objectives

- Promote awareness & enhance safety
- Support victims of violence
- Publish reliable safety & crime data
- Ensure compliance

Types of Clery Risks

- Safety
- Legal, Regulatory
- Operations & services
- Financial
- Reputation

Risk = The possibility of an event occurring that will have an impact on the achievement of objectives.



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Key Clery Act risk areas

- **Administrative Capability/ System of Internal Controls**
- Roles, Responsibilities, & Resources
- Identification and Interpretation of Clery Act Requirements
- Policies and Procedures
- Technology
- **Geography**
- **Campus Security Authorities (CSAs)**
- Crime Statistics
- Daily Crime Logs
- **Annual Security Report (ASR)**
- Missing Student Notifications
- Fire Safety Disclosures & Log
- Incident Reporting, Response, Investigation, & Discipline
- Emergency Response & Evacuation
- Timely Warnings & Emergency Notifications
- Educational Programs & Campaigns
- Diversity, Equity, and Inclusion (DEI)

Red = focus for today's webinar

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Poll #3

What do you think is the biggest risk area for Clery Act compliance at your college or university?

1. Roles, responsibilities, & resources
2. Geography
3. Campus Security Authorities (CSAs)
4. Crime statistics
5. Emergency response
6. All the above



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Potential impacts of Clery Act risk events

- Serious harm or death
- Investigations and audits
- Civil penalties (maximum fine per violation \$62,689)
- Suspension or termination from participation in Title IV
- Lawsuits and settlements
- Decreased enrollment
- Lost revenue
- Damage to reputation and organizational culture

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Poll #4

What has been the range of fines issued within the past five years to institutions with Clery violations?

1. \$1,000 to \$25,000
2. \$30,000 to \$250,000
3. \$30,000 to \$4,500,000

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Penalties per violation

KHO

- Published fines issued by the Department against noncompliant institutions within the past five years have ranged from a **\$30,000** fine issued to Cottey College in 2017 to a **\$4,500,000** fine issued to Michigan State University in 2018.
- Penalties per violation increase based on inflation each year. They are now \$62,689 (2022), up from \$59,017 (2021).



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Let's look more closely at 4 key areas of risk...

1. Administrative Capability/ System of Internal Controls
2. Geography
3. Campus Security Authorities (CSAs)
4. Annual Security Report (ASR)



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KH0



Risk Area: Administrative Capability KH1

- Must be able to demonstrate administrative capability. See 34 C.F.R. 668.16.
- Must have adequate checks and balances in a system of internal controls
- Administrative capability assessed by Dept of Education using:
 - Committee of Sponsoring Organizations (COSO) of the Treadway Commission’s “Internal Control—Integrated Framework”
 - U.S. Government Accountability Office’s “Standards for Internal Control in the Federal Government,” known as the Green Book

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KH0



Risk Area: KH2 Administrative Capability

Risks	Controls
<ul style="list-style-type: none"> • Roles and responsibilities not defined, segregated KH1 • Inadequate resourcing • Requirements not understood • Objectives not defined • Control gaps • No policies/procedures • Technology issues • No monitoring • No error handling 	<ul style="list-style-type: none"> • Designated Clery Compliance Officer • Structure for collaboration (Clery team/committee) • Allocation of sufficient resources • Periodic training • Process for interpreting requirements; defining objectives • Policies, procedures, and position descriptions for all significant aspects of Clery in a sufficient level of detail • Process for designing/implementing controls • Monitoring via ongoing or periodic separate evaluations • Process for communicating and correcting deficiencies

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Risk Area: Administrative Capability

Assessment Techniques	Example Findings
<ul style="list-style-type: none"> Use internal control framework for criteria, like COSO Interview individuals across institution Walkthrough processes and IT systems Review institution-wide and unit specific policies and procedures Review position descriptions, org charts, committee charters Review resource allocation/budgeting Consider how administrative capability gaps might contribute to Clery deficiencies 	<ul style="list-style-type: none"> Failure to administer the Clery program with adequate checks and balances in a system of internal controls Failure to employ an adequate number of qualified persons to administer the Clery program Failure to involve staff with legal, risk management, audit, internal control, and Federal education compliance experience to design Clery processes with appropriate controls that align with applicable internal control standards and meet compliance requirements

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A closer look at roles & responsibilities

Risk	Controls	Assessment Techniques	Example Findings
<ul style="list-style-type: none"> Roles and responsibilities not defined for all significant aspects of the institution's Clery processes in a sufficient level of detail resulting in non-compliance 	<ul style="list-style-type: none"> Clery Compliance Officer Structure for collaboration (Clery team/committee) Roles and responsibilities documented in policies, procedures, position descriptions 	<ul style="list-style-type: none"> Interview individuals across institution to determine if responsibilities for each area of Clery have been assigned and are understood Review policies, procedures, position descriptions Review committee charters 	<ul style="list-style-type: none"> Failure to involve staff with legal, risk management, audit, internal control, and Federal education compliance experience to design Clery processes with appropriate controls that align with applicable internal control standards and meet compliance requirements

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Clery Act roles & responsibilities

Positions that have some degree of involvement with institution's overall Clery compliance activities and should be engaged in the compliance process¹:

- Public Safety/ Police Department
- Student Conduct
- VP Student Affairs/Dean of Students
- Provost/Academic Affairs Office
- Admissions
- General Counsel's Office
- Student Activities/Fraternity & Sorority Life
- Compliance & Internal Audit
- Environmental Health & Safety
- Resident Life and Housing
- Title IX Coordinator/Sexual Assault Response Team Leader
- Risk Management (Fire Safety Engineer)
- Study Abroad Office
- Real Estate Office
- Director of Student Health
- Human Resources
- Athletics

Swope, L. (2015). *Developing a Clery compliance committee* [White paper]. National Association of Clery Compliance Officers and Professionals. <https://www.naccop.org/general-resources>

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Risk Area: Geography

- Location, location, location.
- Clery is **geography-centric** -- it requires an institution to take action with respect to reports based on **WHERE** the incident occurred, not on **WHO** was involved.
- If you cannot identify your **Clery geography**, then you will never know the accurate number of relevant reports to which you were required to respond.

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Clery Geography Categories

On Campus

On Campus
Student Housing

Non-campus

Public Property

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On Campus

- Any building or property **owned or controlled by** a postsecondary educational institution within the same **reasonably contiguous** geographic area as the campus and used in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and
- Any building or property that is within or reasonably contiguous to these areas, that is **owned by the institution** but **controlled by another person**, is frequently used by students, and supports institutional purposes (such as food or other retail vendor).

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On Campus (understanding key terms)

Controlled by means that your institution (or an institution-associated entity)

- directly or indirectly rents, leases or has some other type of **written agreement (including an informal one)**, such as a letter, e-mail, or post-it) for use of a building or property, or a portion of a building or property.
- Even if there is no payment involved in the transaction, for Clery purposes, a written agreement for the use of space gives your institution **control** of that space **for the time period specified in the agreement.**

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On Campus (understanding key terms)

Reasonably contiguous refers to a building or property, that your institution **owns or controls**, that is in a location that you and your students consider to be, and treat as, part of your campus.

- Think within a one-mile radius of your campus border KH0
- ED says determination is case-by-case
- If you exclude buildings within one-mile radius, must be able to explain: e.g., building within one-mile radius but separated from campus by a public, six-lane highway.

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More Than One Campus

If your institution has more than one campus, **each campus** must comply **independently** with all of the Clery Act, and fire- and safety-related requirements, outlined in the Handbook.

- This means that your institution is either to publish a separate ASR and AFSR for each campus each year, or it can issue one ASR and AFSR to cover all campuses, but each campus must be clearly delineated.
- So, for example, if your institution owns a research campus, such as a farm, agricultural center, or other noncontiguous research facility that has **an administrator on-site** and is **used by students on a recurring basis**, it's to be considered a separate campus.

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On Campus Student Housing

Any student housing facility **that is owned or controlled** by the institution; or located on property owned or controlled by the institution; and is reasonably contiguous to the geographic area that makes up the campus.

- If the **institution owns or controls** a building that houses a fraternity or sorority (officially or unofficially recognized) within the confines of the campus, then that building is considered on-campus (student housing facility).
- If a **fraternity or sorority (officially or unofficially recognized) owns or controls** a building that is located within the confines of the campus on land that is owned by the institution, then that building is considered on-campus (student housing facility).

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Public Property

Understanding what's "on campus" is vital, not just for accurately disclosing on-campus crime statistics, but for properly identifying your schools 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.

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Non-campus building or property

- Any building or property **owned or controlled by a student organization** that is **officially recognized** by the institution; OR
- Any building or property **owned or controlled by the institution** that is used in direct support of, or in relation to, the institution's **educational purposes**, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution (**typically includes off-campus student housing, study abroad programs, off-site education locations (including student travel)**).

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Risk Area: Geography

Risks

- Missing or incorrectly categorized locations
- Lack of documentation (no maps or lists)
- Resulting in incorrect crime statistics, daily crime logs, and Annual Security Reports (ASRs), and decreased ability to comply with other Clery requirements that rely on geography

Controls

- Process for identifying and tracking locations used in support of educational purposes for which crimes must be disclosed
- Process and tools for categorizing locations (Ex. Decision matrix/tree)
- Review of source documentation, such as space agreements, to determine if a location is in-scope and under which category
- A periodically updated list or map of the buildings and properties that fit each defined geographic category
- Verifications, supervisory review
- Controls over geography data input, processing, and output
- Historic geography lists/maps with supporting documentation

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Risk Area: Geography

Assessment Techniques

- Determine if geography requirements and key terms are defined ("contiguous", "controlled by", "educational purposes")
- Interview units providing geography data (Real Estate, Contracting, Academic/Student Affairs)
- Check if completeness and accuracy verified
- Compare geography to a list of owned/leased properties and information available online
- Compare process for categorizing locations to regulatory definitions; re-categorize sample
- Trace geography to supporting documentation

Example Findings

- Institution failed to properly apply the geographical definitions of the Clery Act
- No effective process to regularly identify and communicate updates to property that the school owned and controlled, and to incorporate updates into Clery geography in a timely manner
- Institution did not properly identify or record its Clery geography for each reporting year, and we could therefore not assess the accuracy of campus boundaries used when determining whether to include criminal incidents in statistics.

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A closer look at categorizing locations

Risk	Controls	Assessment Techniques	Example Findings
<ul style="list-style-type: none"> Incorrectly categorized locations 	<ul style="list-style-type: none"> Process & tools for categorizing locations Review of source documentation Verifications, supervisory review 	<ul style="list-style-type: none"> Determine if key terms used in categorization are defined Interview units providing geography data Compare process for categorizing locations to regulatory definitions Re-categorize sample of locations 	<ul style="list-style-type: none"> Institution failed to properly apply the geographical definitions of the Clery Act

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Statutory definition of separate campus

20 U.S. Code §1092(f)(6)(B) - In cases where branch campuses of an institution of higher education, schools within an institution of higher education, or administrative divisions within an institution are not within a reasonably contiguous geographic area, such entities shall be considered separate campuses for purposes of the Clery reporting requirements.

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Handbook definition of separate campus

2016 Department of Education Handbook for Campus Safety and Security Reporting -

Consider an additional location a separate campus if it meets all the following criteria:

- Your institution owns or controls the site;
- It is not reasonably geographically contiguous with the main campus;
- It has an organized program of study; and
- There is at least one person on site acting in an administrative capacity.

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Definition of separate campus terminology

Key terms used when categorizing Clery geography:

- **"Controls"** - Institution directly or indirectly rents, leases, or has some other type of written agreement (including an informal one) for use of a building or property, even if no payment is involved.
- **"Geographically Contiguous"** - Reasonable to consider locations within one mile of your campus border to be reasonably contiguous with your campus.
- **"Organized Program of Study"** - The location offers courses in educational programs leading to a degree, certificate, or other recognized credential.
- **"Administrative Personnel"** - Encompasses a variety of individuals who may have some responsibility for activities at the locations (Ex. A director, building coordinator, registrar, secretary).

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Examples of separate campuses

- Branch campus
- School
- Research campus
- Athletic campus or complex
- Foreign locations
- Military bases

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Poll #5

How many properties and buildings would you estimate your institution owns or controls?

1. 0-25 properties and buildings
2. 26-250 properties and buildings
3. 251-1,000 properties and buildings
4. More than 1,000 properties and buildings
5. Unsure

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Risk Area: Campus Security Authorities

What is a "Campus Security Authority" or CSA?

- It is a Clery-specific term
- It covers four categories of job functions (covered in next slide)
- The idea is that sometimes people report crimes to individuals at the College **other than** police

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Who is a CSA?

See 34 CFR 668.46(a) "Campus security authority", paraphrased below:

1. Campus police department or campus security department
2. Individuals who have responsibility for campus security but who do not constitute a campus police/security department, such as an individual who is responsible for monitoring entrance into institutional property.
3. Any individual or organization to which students and employees should report criminal offenses, as specified in institution's statement of campus security policy
4. An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline, and campus judicial proceedings. (Exclusions apply to professional counselors.)

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What does a CSA do?

- Tell the institution's designee
- **Immediately**
- About any allegations of Clery offenses
- That occurred on Clery geography
- Reported to them

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Risk Area: Campus Security Authorities

Risks	Controls
<ul style="list-style-type: none"> • Not all individuals who qualify as Campus Security Authorities (CSAs) are designated • CSAs not notified, trained • No complete list of all CSAs; rationale for identifying CSAs not documented • Unclear or non-compliant process for CSAs to report alleged crimes • Resulting in incorrect crime statistics, daily crime logs, and Annual Security Reports (ASRs), and decreased ability to comply with other Clery requirements that rely on robust CSA process 	<ul style="list-style-type: none"> • Process for identifying, notifying, training CSAs • Designated individual or office to coordinate and oversee CSAs • Process for updating job descriptions of individuals who fit the definition of a CSA • Process for contacting all CSAs annually in writing, or upon changes, to remind them of obligation • Mechanism for CSAs to report alleged crimes to office responsible for statistics • Audit trail supporting CSA identification, notification, and training

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Risk Area: Campus Security Authorities

Assessment Techniques

- Determine whether process for identifying CSAs is designed to comply with Clery definitions
- Determine whether process for notifying/training CSAs is aligned w/ Dept of Ed Handbook
- Review current listing of CSAs to determine whether functions required by Clery are included and that listing has been updated
- Interview/survey CSAs regarding their level of understanding of reporting responsibilities
- Verify whether audit trail supporting identification, notification, and training of CSAs is sufficient

Example Findings

- institution did not properly identify CSAs
- institution did not have a process to evaluate every staff position and identify which staff members were CSAs or to update its CSA listing during new employee onboarding and throughout the year to reflect changes in staffing
- institution did not have effective processes to communicate CSA responsibilities
- CSAs generally did not use the designated crime reporting process

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A closer look at designating CSAs

Risk

- Not all individuals who qualify as Campus Security Authorities (CSAs) are designated

Controls

- Process for identifying, notifying, training CSAs
- Designated individual or office to coordinate and oversee CSAs
- Audit trail supporting CSA identification, notification, training
- Process for updating job descriptions of individuals who fit the definition of a CSA

Assessment Techniques

- Determine whether process for identifying CSAs is designed to comply with Clery definitions
- Review current listing of CSAs to determine whether functions required by Clery are included and that listing has been updated

Example Findings

- Institution did not properly identify CSAs
- Institution did not have a process to evaluate every staff position and identify which staff members were CSAs or to update its CSA listing during new employee onboarding and throughout the year to reflect changes in staffing

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Positions that may meet CSA designation criteria

- All campus police and/or security department
- Dean of students overseeing student housing, student center, extracurriculars
- 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 dorms
- Coordinator of Greek affairs
- Director of a campus health or counseling center
- Victim advocates
- And more

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Risk Area: Annual Security Report

Risks	Controls
<ul style="list-style-type: none"> • Annual Security Report (ASR) contains incorrect crime statistics • ASR contains incorrect/ incomplete policies statements; missing statements • ASR contains inaccurate terminology/ definitions • Information in ASR doesn't reflect actual underlying policies and activities • ASR distribution, notification not compliant • Resulting in misinformed readers and fines from Dept of Ed 	<ul style="list-style-type: none"> • Process for preparing and distributing ASR to all enrolled students and current employees annually, including steps for providing notice of report availability to all prospective students and employees • Cross reference to underlying policies/ procedures • Verifications, reconciliations, supervisory review of the ASR (e.g. Using Appendix C in the Handbook) • Comparison of ASR statistics to Dept of Ed Campus Safety & Security Web-Based Data Collection • Audit trail supporting statistics reported in the ASR • Process for handling ASR errors

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Risk Area: Annual Security Report

Assessment Techniques

- Check if completeness and accuracy of ASR contents is verified prior to finalizing
- Verify all required policy statements included
- Verify whether ASR audit trail is sufficient, and trace compilation of ASR crime statistics to supporting docs and verify counting and reporting agrees to detailed support
- Trace sample of crimes from daily log to ASR
- Compare ASR statistics to Dept of Ed Web-Based Data Collection
- Determine whether there's a defined process for correcting ASR errors

Example Findings

- The institution's Clery Act crime statistics were not complete or accurate
- Criminal incidents identified that the institution should have reported but did not
- Crime statistics reported in the ASR did not agree to statistics reported to the Dept of Ed Web-based Data Collection
- The institution failed to develop numerous required statements of policy, procedure, practice, and programs or to include adequate statement of required policies in its ASRs.

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A closer look at ASR policy statements

Risk

- Information in ASR doesn't reflect actual underlying policies and activities

Controls

- Cross reference to underlying policies/ procedures

Assessment Techniques

- Verify all required policy statements included and cross reference to institutional policies/procedures

Example Findings

- The institution failed to develop numerous required statements of policy, procedure, practice, and programs or to include adequate statement of required policies in its ASRs.

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Example required policy statements

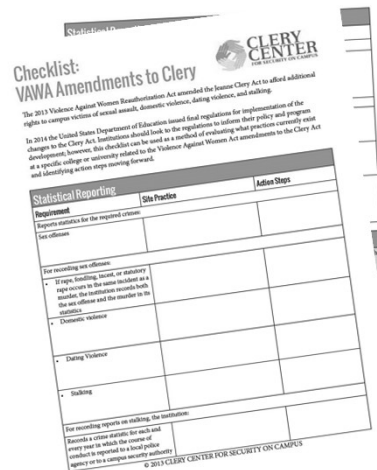
- An institution must **include in its annual security report** a clear **statement policy** that addresses the **procedures for institutional disciplinary action** in cases of alleged dating violence, domestic violence, sexual assault, or stalking, and that...
 - **(i)** Describes each **type of disciplinary proceeding** used by the institution; the **steps**, anticipated **timelines**, and **decision-making process** for each type of disciplinary proceeding; **how to file** a disciplinary complaint; and **how the institution determines** which type of proceeding to use...
 - **(ii)** Describes the **standard of evidence** that will be used...
 - **(iii)** Lists all of the **possible sanctions** that the institution may impose following the results of any institutional disciplinary proceeding...
 - **(iv)** Describes the range of **protective measures** that the institution may offer to the victim following an allegation...

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Compliance resources

- The Clery Center and other organizations provide checklists to make sure you include all required policy statements in the ASR



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Poll #6

Have you ever read your institution's Clery Act Annual Security Report?

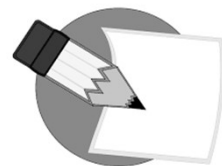
1. Yes
2. No
3. Unsure
4. I don't think my institution is required to publish an Annual Security Report.

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Other techniques for providing Clery Act assurance and advisory services

- Use a risk-based approach
- Use a flexible scoping approach
- Consider whether assurance vs advisory services project
- Decide whether to assess design and operating effectiveness
- Involve all stakeholders throughout the process
- Talk to other audit shops
- Consider how to involve legal counsel and other Clery experts
- Use industry specific guidance and tools (see additional resources)
- Use a trauma-informed approach



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Poll #7

Have you or your institution completed assurance and/or advisory services related to Clery?

1. Yes, assurance only
2. Yes, advisory only
3. Yes, both assurance and advisory
4. No, my institution hasn't completed any Clery audits or advisory service projects yet

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Participant Exercise – Develop an approach for assessing Clery Act compliance

- Take five minutes and develop a high-level approach for how you would assess Clery Act compliance at your institution.
- Think about:
 - How you will identify the highest risk areas to review
 - How you will identify who the project stakeholders are
 - Whether and how you will involve internal and/or external legal counsel and other experts
 - Whether the assessment will be an assurance or advisory project
 - Whether you will assess design and/or operating effectiveness
- In the chat, please share one of your ideas.

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Closing Comments & Final Questions

We have accomplished our objectives!

- ✓ Recognized fundamental Clery Act compliance requirements
- ✓ Described risks, controls, and assurance and advisory techniques in support of Clery Act compliance
- ✓ Developed an approach for assessing Clery Act compliance



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References & Resources

- Handbook for Campus Safety and Security Reporting 2016 Edition
 - <https://clerycenter.org/wp-content/uploads/2017/01/handbook-2.pdf>
- Clery Act Appendix for Federal Student Aid (FSA) Handbook
 - <https://fsapartners.ed.gov/sites/default/files/attachments/2020-10/CleryAppendixFinal.pdf>
- User's Guide for the Campus Safety and Security Web-based Data Collection
 - https://surveys.ope.ed.gov/ccs2k21/wwwroot/documents/2021_Campus_Safety_Users_Guide.pdf
- Code of Federal Regulations § 668.41 Reporting and disclosure of information; § 668.46 Institutional security policies and crime statistics; § 668.49 Institutional fire safety policies and fire statistics; § 668.16 Standards of administrative capability
 - <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-668/subpart-D?toc=1>

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References & Resources

- Clery Center
 - <https://clerycenter.org/>
- National Association of Clery Compliance Officers and Professionals (NACCOP)
 - <https://www.naccop.org/>
- ACUA Kick Starter
 - https://acua.org/ACUA/media/Strategic_Partners/images/Kick-Starter-Clery-Act-Compliance.pdf
- Department of Education Audits & Program Reviews
 - <https://studentaid.gov/data-center/school/clery-act-reports>
 - <https://www2.ed.gov/about/offices/list/oig/rpauditfsa.html#schoolspecific>

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Poll #8 (Extra Poll)

Is the Clery Act limited to requirements for crime statistics?

1. Yes
2. No
3. Unsure

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