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## **Key Questions Institutional Leaders Need to Ask about Clery Compliance on Their Campuses**

November 2, 2017

### **Campus Security Authorities**

- Has the institution identified and gathered statistics from everyone who is a Campus Security Authority under the law?
- Has the institution been maintaining a list of all CSAs for each academic year?
- Has the institution trained each individual who has been identified as a CSA in the basic responsibilities and requirements of the Clery Act?
- Is the institution maintaining training records for all CSAs?
- Has the campus police/public safety staff (and other personnel writing reports, such as RAs or the Title IX Coordinator) received training beyond the training that would be appropriate for other CSAs?

### **Clery Geography**

- Do you have a Clery Map of the core campus?
- Have the streets running through or immediately adjacent to and accessible from the campus been clearly identified as Public Property versus On Campus property based on who owns or controls them?
- Have all of the Noncampus properties been identified, both domestic and international?
- Has the Clery Map been reviewed and approved by the General Counsel, Police/Public Safety Department and Real Estate Office, at a minimum?
- Are your campus police/public safety and student conduct office personnel using the same map for the purposes of categorizing crime statistics?
- Do you have a process for assessing off-site locations for Clery reportability used by the institution and student organizations?

### **Crime Statistics**

- Is the campus police department translating the classifications of all of its incident reports to the Federal Clery Act definitions before reporting statistics in the Annual Security Report?
- Is the Clery Compliance Officer requesting crime reports from all of the correct entities on campus?
- Is the Clery Compliance Officer requesting statistics from all of the local/state law enforcement agencies that have jurisdiction on or within your Clery Geography?
- Is the student conduct office using the Clery Act crime definitions to report statistics in the Annual Security Report?
- Has the campus police/public safety department and the student conduct office determined which state criminal codes and local ordinances are reportable under the broader UCR definitions of the for liquor, drug and weapons law violation categories?
- Have the people who classify crime statistics in the campus police/public safety department and in the student conduct office received adequate training for this purpose?



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### **Annual Security/Fire Safety Report**

- Has the institution addressed all of the policy statements in the Annual Security Report/Annual Security & Fire Safety Report?
- How does the institution communicate the availability of the Annual Security Report/Annual Security & Fire Safety Report to prospective students and employees, if at all?
- Has the institution been distributing the Annual Security Report/Annual Security & Fire Safety Report to current students and employees by Oct. 1 each year?
- Does the institution have adequate documentation to support the distribution requirements have been met?
- Has the institution confirmed the crime and fire statistics included in the Annual Security/Fire Safety Report(s) match the statistics reported to ED via the Campus Safety and Security Survey?

### **VAWA Requirements**

- Has the institution developed a VAWA and Title IX compliant sexual misconduct policy that supports the required policy statement disclosures pertaining to the investigation and resolution of Domestic Violence, Dating Violence, Sexual Assault and Stalking offenses?
- How is the institution meeting the requirement to provide initial and ongoing prevention and awareness programs for students and employees that addresses all of the required content areas?
- Has the institution developed an educational campaign that includes initial and ongoing prevention and awareness programs and initiatives?
- Has the institution developed a written explanation of rights that includes the required information about your institution's procedures and practices?

### **Timely Warning Notices and Immediate Notifications**

- Does the institution have an internal policy or operating procedure that governs how the institution manages the Timely Warning and Immediate Notification processes beyond what is disclosed in the Annual Security Report?
- Has the institution worked through the issue of assessing reported acquaintance rapes for potential TW notices?
- Has the institution developed and agreed up templates with approved language for TWN and IN situations?

### **Emergency Response Testing (Exercises and Drills)**

- Has your institution conducted a compliant test (exercise and drill) involving key institutional representatives and first responders?
- Have you written an after-action report to document your evaluation of emergency plans and capabilities? (best practice)
- Have you publicized your institution's emergency response and evacuation procedures in conjunction with the test?

### **Daily Crime Log**

- Has the institution developed a crime log containing all required categories that is being updated within 2 business days of receiving crime reports?



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### **Fire Safety Policies/Fire Log**

- Is the institution maintaining a fire log with all required categories that is limited to actual fires?
- Have fire statistics been disclosed for the three most recent calendar years with each On Campus Student Housing Facility identified by name and address?
- Do your fire safety disclosures address the policies or rules on portable electrical appliances, smoking and open flames in a student housing facility?

### **Missing Student Procedures**

- How, if at all, does your institution provide residential students with the opportunity to designate one or more missing persons contacts?
- Has your institution limited access to missing person contact information?
- Does your institution require that any missing student report must be referred immediately to the institution's police or campus security department or, if no department exists, to the local law enforcement agency that has jurisdiction in the area?

### **Managing Compliance**

- Does the institution have a Clery Compliance Committee?
- Has the institution officially designated a Clery Compliance Officer and given them the authority and responsibility to manage compliance with the Clery Act on behalf of the institution?
- Has the Clery Compliance Officer received in-depth training in the Clery Act?

### **Upcoming FREE Webinar: Developing a Clery Compliance Committee**

- Thursday December 7, 2017 (3pm – 4:15pm EST).
- This webinar will explain why institutions need a committee, who should be on it and what their role should be to assist the compliance efforts. Gather the right people who need to hear this on your campus and join this session. Complying with the Clery Act is an institutional responsibility. This webinar assists in identifying key stakeholders, initiating discussion related to the Clery Act and important agenda topics in order to launch your Clery Compliance Committee.
- Visit [www.naccop.org](http://www.naccop.org) and select the “Training & Webinars” tab

### **Referenced NACCOP White Papers**

- *The Resurgence of the Drug-Free Schools and Communities Act: A Call to Action*  
To access, visit: [www.stanleycss.com/dfsc](http://www.stanleycss.com/dfsc)
- *Analyzing a Fire from a Clery Act/HEOA Perspective*  
To access, visit: [www.stanleycss.com/cleryactfire](http://www.stanleycss.com/cleryactfire)

### **About NACCOP**

NACCOP provides a professional association for Clery Compliance Officers and Professionals to collaborate with each other, share resources and best practices. Members are also offered opportunities to participate in professional development engagements which support colleges and universities in their efforts to comply with the Clery Act. NACCOP delivers members with resources to enhance their knowledge of the Clery Act by offering education and training opportunities for the employees who are acting as Clery Compliance Officers on college and university campuses as well as information about Clery related news and legislative updates. For more information, or to join NACCOP, visit [www.naccop.org](http://www.naccop.org).