

Recommendations

The *Clery Act* regulations do not address coordinating your crime reporting process or training your campus security authorities. However, because the role of CSAs is vital to compliance with the law, many schools have requested suggestions for doing so. The following section addresses those requests by providing **recommendations—not requirements**—which your school can adapt to meet its unique configuration and needs. As you read them, please keep in mind that the effort and coordination needed to comply with the requirement to collect crime reports varies significantly depending on several factors, such as the size of your school, the number of individuals or offices that meet the campus security authority definition, whether your school has law enforcement or security personnel and whether you provide student housing.

- **Designate an individual or office to coordinate and oversee your campus security authorities.**

This can be particularly helpful for schools with a large number of CSAs. Assign someone who is knowledgeable about the *Clery Act* to coordinate everything from identifying your institution’s CSAs to making sure all crime reports are accounted for.

Rather than assuming that because a CSA hasn’t forwarded a crime report to the appropriate individual or office, no crimes were reported to that CSA, a coordinator can be charged with canvassing each CSA to request crime reports from them. CSAs who don’t have crimes to report can be asked to document this in writing. This could be as simple as writing a statement that reads, “From _____ to _____ I was not aware of, and did not receive, any reports of criminal incidents, arrests or disciplinary actions for Clery crimes.” Even if crime reports are submitted online, it’s a good idea to ask CSAs to indicate if they have no crimes to report.

- **Make sure your campus security authorities know they’re campus security authorities.**

To do this, we suggest that you update the job descriptions of individuals at your institution who fit the definition of a CSA. Make this designation an official part of their job description so that they know what’s required of them.

You may also want to contact all CSAs annually in writing to remind them of this obligation. (See sample letter to campus security authorities in Appendix B-1.) Because of turnover, or a change in job descriptions, you may have to notify some individuals mid-year.

- **Provide training.**

CSAs have an important job to do and providing them with training will help to ensure that they do it properly. Training can be provided in a variety of ways ranging from sending materials in an e-mail to face-to-face meetings that include PowerPoint presentations and training manuals. Whatever form your training takes, Figure 6 provides some elements you might want to include.

- **Forward crime reports to your campus police or security department, if you have one.**

Encourage CSAs to immediately forward reports of crimes to your campus police or security department if you have one, or to an individual responsible for collecting the reports if you don't. This is because a CSA crime report may be the basis for determining if there is a serious or continuing threat to the safety of the campus community which would require an alert (i.e., a timely warning). (More about timely warnings in Chapter 6.) Also, if your institution has a campus police or security department and a crime is reported to a non-police/security CSA, the report should be forwarded to your campus police or security department so that it will be entered in your institution's daily crime log in a timely manner. (More about the crime log in Chapter 5.)

- **Keep documentation of all crime reports.**

Keep hard copy or electronic documentation for all CSA-reported crimes and make sure that more than one person knows where it's kept. If there is reason to believe that a crime report was not made in "good faith," and your institution does not disclose a statistic for the reported incident, we strongly suggest that you document the justification for not disclosing the statistic.

Figure 6. Suggested Training Elements for Campus Security Authorities

Describe the role of a CSA—The *Clery Act* is a federal law that requires the institution to identify individuals and organizations that meet the definition of a campus security authority. CSAs have an important role in complying with the law. Explain that CSA crime reports are used by the school to:

- Fulfill its responsibility to annually disclose Clery crime statistics, and
- To issue timely warnings for Clery crimes that pose a serious or continuing threat to the campus community.

If an individual reporting an incident needs assistance, a CSA should explain how to get help. Let a victim know that help is available even if he or she does not want an investigation conducted. The decision to act on this option is the victim's. In the midst of an emergency situation, such as a physical assault, however, a CSA should contact the campus police or call 911, as appropriate.

Provide reporting materials—Good recordkeeping can help minimize the chances of double reporting crimes. Suggested materials are:

- Descriptions, a map, or both, of the school's Clery geography.
- A list of Clery crimes and definitions.
- Hard copy or electronic Crime Report forms for documenting criminal incidents. (See sample forms in Appendices B-2 and B-3.)

Discuss the importance of documentation—Explain that if CSAs are unsure whether an incident is a Clery crime, or even if it's criminal in nature, they should report it.

- Stress the importance of providing as much information about a criminal incident as possible to aid law enforcement and to categorize the crime.
- Explain that CSA crime reports should include personally identifying information if available. This is important for law enforcement purposes and to avoid double counting crimes. The Clery statistical disclosures based on those reports, however, must be kept anonymous; no personally identifying information will be disclosed.
- If a victim doesn't want the report to go any further than the CSA, the CSA should explain that he or she is required to submit the report for statistical purposes, but it can be submitted without identifying the victim.

Emphasize the need for timely report submission—Explain that if a crime is reported to a CSA, but goes no further than that, the school won't have fulfilled its obligation under the law, and the campus community might not have the information they need to stay safe on campus. Instruct CSAs:

- How to submit their crime reports in a timely manner, and
- To whom reports should be submitted.