

# SC Clery Act Overview

Full Course

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## Introduction

## The Clery Act

In 1986, freshman Jeanne Clery was brutally raped and murdered in her dorm room by a student she had never met who entered her residence hall through a propped-open door. After Jeanne Clery's death, her parents learned that there had been 38 violent crimes on campus during the previous three years.

To help protect others, her parents championed numerous state laws and, ultimately, a federal law named the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, known as the Clery Act.

Passed in 1990, the Clery Act requires U.S. colleges and universities to annually disclose campus crime statistics and security information. The tragedy of Jeanne's murder and the perseverance of her family led to significant changes in the reporting and prevention of campus crime.

## Clery Act Enforcement

All institutions of higher education, public or private, that participate in federal student aid programs must comply with the Clery Act, which is enforced by the U.S. Department of Education.

The enforcement team is responsible for investigating an institution's compliance with the Clery Act. An investigation can be triggered by media stories, a complaint filed by a student or outside party, a whistleblower, or anyone in the public. The Department of Education also conducts general assessment compliance reviews and audits.

When a review is completed and an institution is found to be in noncompliance with the Clery Act, the Department of Education, Student Aid Office issues a Program Review Report that details noncompliance concerns, gives the institution an opportunity to respond, and issues its Final Program Review Determination Letter. A fine per violation may be imposed, which is re-evaluated and adjusted periodically for inflation.

## Program Participation Agreements

An institution may participate in a Title IV, Higher Education Act student financial aid program only if it enters into a written program participation agreement with the Secretary of Education. This agreement consists of the conditions that institutions must meet, including compliance with the Clery Act.

For this reason, institutional leadership, administrators and campus security authorities play an important role in ensuring the institution's Clery Act compliance and supporting campus safety.

The regulations adopted by the Department of Education through a negotiated rulemaking process, provide details on Clery Act compliance.



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## Key Elements of Clery Act Compliance

In order to stay compliant with the Clery Act, institutions must:

- compile, publish and distribute an Annual Security Report (or ASR) that includes campus crime (and fire, if applicable) statistics to the Department of Education
- maintain accurate campus security policies and procedures that meet the needs of the campus community
- maintain a daily crime log and up-to-date information about ongoing threats to the health and safety of the campus community (and)
- provide primary and ongoing awareness and prevention education programs for students and employees that comply with the Violence Against Women Act (or VAWA) amendments to the Clery Act

We'll take a closer look at each of these areas later in the course.

## Goal

This course is designed to provide an overview of the Clery Act and to educate college administrators and campus security authorities about their role in helping the institution meet its legal responsibilities under the Clery Act.

By the end of this course, you will be able to:

- Identify key elements of the Annual Security Report, emergency notification and timely warnings
- Review campus security authorities' reporting responsibilities
- Examine campus security policies and education requirements under the VAWA amendments to the Clery Act (and)
- Discuss the challenges to implementing the Clery Act and the keys to compliance

At the end of the course, you'll have a chance to apply what you've learned during a brief quiz.

So, if you're ready, let's begin.

## Key Elements of the Clery Act

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## The Annual Security Report

[1] Each institution that offers federal financial aid must prepare an Annual Security Report (or ASR; [an] AFSR if it includes fire safety) that includes its campus policy statements and statistics for reported crimes that were committed on or around the institution's campus (referred to as Clery geography).

[2] To ensure that all reports of alleged crimes on their Clery geography are collected for the ASR, institutions must identify individuals or offices with significant responsibility for student and campus activities. These are referred to as campus security authorities (or CSAs).

[3] An official designated by the institution must:

- make a good-faith effort to collect all crime reports received by campus police, security personnel and CSAs
- compile crime statistics from these reports (and)
- provide the crime statistics to the Department of Education and the campus community (faculty/staff/students) by October 1 each year

## **The Annual Security Report** (cont.)

[4] The ASR can be filed along with the institution's Fire Safety Report required for campuses that have student housing (20 U.S.C. § 1092(i)). These reports must be made available to current and prospective students and staff.

The design of the institution's ASR/AFSR requires collaboration among multidisciplinary teams to bring all of the required elements together.

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## Clery Teams

[1] A promising practice for Clery compliance is to bring together a team of administrators at the institution. It's best to consider roles where individual functions intersect with compliance.

Let's consider two examples of Clery teams for ASR creation. A smaller institution may see administrators serving in multiple roles.

[2] A team at a smaller institution may comprise:

- a compliance officer (or attorney)
- the dean of students
- a communications team representative (when necessary)
- the director of public safety/campus police (and)
- a case manager



### **Clery Teams (cont.)**

A larger institution may have more resources and staff whose roles intersect with Clery Act compliance. A team at a larger institution may comprise members from various departments and offices, including:

- Title IX
- public safety
- human resources
- compliance and privacy
- risk management and insurance
- legal counsel
- student conduct
- housing services
- fire and emergency services
- alcohol and other drug programs
- sexual violence prevention and education
- the women's center
- student or campus life
- college health and academic services
- external affairs (and)
- affirmative action

The team may also include a crime mapping and data analyst and/or a sexual violence investigative officer, with the primary goal of creating a collaborative approach to Clery Act compliance.

## Campus Crime Statistics

The crime statistics presented in the ASR must include all reportable offenses for the three preceding calendar years. The crimes reflected are derived from the FBI's Uniform Crime Reporting and are often referred to as Clery Act crimes.

Below are the four general categories of Clery Act crimes that must be included in the ASR:

- criminal offenses
- hate crimes
- VAWA offenses (and)
- arrests and referrals for disciplinary action

Let's go over the types of crimes that fit into each of these categories.



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## Campus Crime Statistics: Criminal Offenses

According to the Clery Act, criminal offenses include:

- criminal homicide (which includes)
  - murder and non-negligent manslaughter (and)
  - manslaughter by negligence
- sexual assault or sex offenses (which includes)
  - rape
  - fondling
  - incest (and)
  - statutory rape
- robbery
- aggravated assault
- burglary
- motor vehicle theft (and)
- arson

## Campus Crime Statistics: Hate Crimes

[1] A hate crime is a criminal offense that was motivated by the perpetrator's bias against another person's actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin and/or disability.

[2] All Clery Act crimes can be classified as a hate crime, as well as:

- larceny-theft
- simple assault
- intimidation (and)
- destruction, damage or vandalism of property

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## Campus Crime Statistics: VAWA Offenses

According to the Clery Act, VAWA offenses include:

- domestic violence
- dating violence (and)
- stalking

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## Campus Crime Statistics: Arrests and Referrals for Disciplinary Action

According to the Clery Act, any arrests or referrals for disciplinary action must also be reported in the ASR/AFSR, including:

- weapons law violations
- drug abuse violations (and)
- liquor law violations

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## The Hierarchy Rule

If more than one crime is committed in a single incident, institutions generally only count the most serious offense in their Clery crime statistics.

The order of severity follows the FBI's Hierarchy Rule, listed from most to least severe:

- murder and non-negligent manslaughter
- manslaughter by negligence
- sexual assault, including rape, fondling, incest and statutory rape
- robbery
- aggravated assault
- burglary
- larceny-theft
- motor vehicle theft (and)
- arson

For example, if a person suffers both an aggravated assault and a sexual assault, only the sexual assault will be included in the institution's Clery Act crime statistics.

## Exceptions to the Hierarchy Rule

Some exceptions and nuances to the Hierarchy Rule are:

- if an incident involves both a sex offense and a murder, both offenses are counted
- arson is always counted, along with the most serious offense involved in the incident (and)
- attempted and completed crimes are counted the same, except for attempted murder, which is counted as an aggravated assault

Importantly, the Hierarchy Rule only applies if the same perpetrator commits multiple offenses in the same place and in rapid succession. If the time or physical distance between the offenses is significant, the Hierarchy Rule doesn't apply and all of the offenses are counted in the Clery Act's crime statistics.



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## Reporting

To ensure that accurate and complete crime data is submitted to the Department of Education in accordance with Clery Act requirements, it's important to provide sufficient information to the official or office designated to receive reports, or who are responsible for making sure that all campus crime reports are properly identified, classified, compiled and disclosed.

Extensive training is required for individuals responsible for creating the ASR to understand how to identify and count Clery Act crimes.

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## Clery Geography

The Clery Act requires that institutions disclose crimes for offenses that occur in a specific area, often referred to as the institution's Clery geography. Three key categories identify Clery geography:

- on-campus
- non-campus (and)
- public property

Let's go over each of these.

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## Clery Geography: On-campus

On-campus Clery geography is any building or property in a reasonably contiguous area that is:

- owned or controlled by the institution and used in relation to the school's educational purposes, including student housing facilities (or)
- owned by the institution but controlled by another party, is frequently used by students and supports institutional purposes (such as a campus bookstore in the student union building)

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## Clery Geography: Non-campus

Non-campus Clery geography is any building or property that isn't part of the core campus but is owned or controlled by the institution or an officially-recognized student organization, such as a fraternity or sorority.

These buildings or property must also be used in relation to the institution's educational purposes and/or frequently used by students, such as an off-campus residential building.

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## Public Property

Public property is property owned by a public entity (such as city or state government) that is located within the institution's campus or adjacent to or accessible from campus.

Examples include public sidewalks, streets, bike paths, and parking lots or garages.

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# CSA Reporting Responsibilities

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## Campus Security Authorities

The Clery Act requires institutions to disclose Clery crimes that were reported to a CSA or to local law enforcement. CSAs are people employed by or affiliated with the institution who:

- work in a campus police or security department
- are responsible for on-campus security, such as someone whose job is to monitor an entrance into institutional property
- have been specified in the campus security policy as someone to receive reports of Clery crimes (or)
- is an official with significant responsibility for student and campus activities, including student housing, discipline and campus judicial proceedings

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## Campus Security Authorities (cont.)

Some examples of CSAs are:

- campus police officers and security guards
- resident advisors or assistants
- students who monitor access to residence halls
- faculty advisers
- faculty members who are responsible for student activities outside of the classroom
- deans
- directors or department heads
- athletic directors
- coaches
- Title IX coordinators (and)
- (the) coordinator of Greek affairs



## CSA's Responsibility to Report

The CSA's reporting responsibility has two primary objectives. The first is to obtain accurate crime statistics. The second is to ensure the timely reporting of crimes or other known dangers so that timely warnings and/or emergency notifications can be issued to the campus community when needed.

An exception to the CSA's responsibility to report applies if the person was acting as a pastoral or professional mental health counselors when they received the information.

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## Policies and Procedures

Check your institution's policies and procedures to understand your role and reporting responsibilities, including how to report basic facts to an appropriate official so that Clery-reportable crimes are compiled and accurately classified. If the offense is ongoing or people are at risk, CSAs should call 911 or the campus police.

It's important to understand any additional reporting responsibilities you may have under the institution's policies and applicable state or federal laws. These responsibilities may include reporting information about possible sexual harassment, sexual assault, domestic violence, dating violence, and stalking or sexual misconduct to the institution's Title IX coordinator. Suspected child abuse or neglect must be reported to federal or state authorities.

Contact your institution's Clery team with any questions.

## How to Respond

As an employee of our institution, you may find yourself needing to respond to someone who reaches out for support. When someone chooses to disclose a harmful experience to you, it's because they trust you. And the way you respond can have a significant impact on their healing process.

It's important to honor that trust, and your responsibility to the students, by making a decision to act. Develop a strategy for how to act, and build a framework you can rely on if you ever feel that you don't know how to respond in the moment.

Let's explore a few ways you can do this.



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## Affirm

Everyone, whether required to report or not, can offer support by acknowledging the student's decision to share this information with you. You can say something like, “Thank you for sharing this with me. I’m sorry you’re going through this. I care about you, and I want to help you.”

If you are required to report, in addition to affirming, you must also interrupt before details of the incident are revealed, and inform the student of your role and reporting obligations. Doing so will give the student the opportunity to decide if and how they want to proceed.

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## Inform

Next, inform the student you are required to report incidents of sexual misconduct to the Title IX Coordinator.

If you have a reporting obligation, explain that you are required to report because of your role at the school. Then give them the option to stop and talk to confidential resources, like a mental health professional.

At this time, the student may decide not to report the incident to you, or to anyone. While you certainly can encourage them to report or get support, the choice is theirs and should be respected.

However, if the student discloses a sexual misconduct you must contact your Title IX Coordinator.



## Barriers to Reporting

Let's look at some reasons why someone might have difficulty making the decision to report an incident involving a particular person, so we can understand their experience and offer our support.

The person may be a distinguished colleague. People renowned in their field are sometimes given a pass because of the value of their professional contributions.

It may also be difficult to report a friend. When a friend exhibits troubling behavior, we sometimes make justifications for their actions for fear of alienating them.'

Athletes often contribute to a positive perception of their institutions, and it can be tempting to look the other way when wrongdoing occurs.

And when a model student steps out of line, it can be easy to make the excuse that reporting them would put their academic progress at risk.

## Retaliation

Fear of retaliation can also have real consequences when it comes to someone reporting an incident of sexual violence.

The 2019 AAU Climate Survey on Sexual Assault and Sexual Misconduct found that 70% of respondents didn't contact an institution's program or resource after experiencing sexual assault.

The survey results also revealed that respondents' likelihood of not reporting because they feared retaliation varied according to their gender identity:

- transgender, genderqueer, nonbinary or gender nonconforming students: 17.6%
- female students: 11.4%
- male students: 10.9% (and)
- students who declined to state their gender identity: 22.8%

## Forms of Retaliation

Retaliation can come in many forms. Generally, it's intimidation, threats, coercion or discrimination against someone because they reported or complained, testified, assisted, or participated (or refused to participate) in any manner in an investigation, proceeding or hearing involving sexual assault, sexual misconduct or other sex-based discrimination.

Retaliation may also occur when a person is charged with code of conduct violations (such as alcohol or drug violations) that don't involve Title IX violations but arise out of the same facts or circumstances as a reported incident of sexual misconduct.

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## Retaliation Violates Federal Laws

It's important that everyone on our campus knows that Title IX and the Clery Act prohibit retaliation against all victims or bystanders who report or participate in an investigation or grievance proceedings that involve sexual harassment, sex based discrimination and sexual misconduct.

These protections have been put in place and are enforced to protect persons who experience harm, their friends and/or bystanders, and encourage them to report or seek help when they or someone they know has experienced sexual harassment, sex based discrimination sexual misconduct.

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## Impacts of Trauma

Researchers have identified that the brain and body may undergo neurobiological effects when a person experiences trauma from witnessing violence, surviving violent or sexual crimes, experiencing social injustice, being in an accident, or having combat experience.

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## Understanding Impact

Understanding the neurobiological impact of trauma can assist people who experience sexual misconduct in avoiding self-blame and can help those who want to support them be more patient and understanding.

Trauma often impacts three areas:

- memory
- emotions (and)
- physical response

Let's go over each of these in more detail.

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## Understanding Impact: Memory

A person who experiences trauma may hesitate when remembering an event, or only remember details like smells, sounds, or what something felt or looked like.

They may also have accurate, but fragmented memories and not be able to recall details in a linear fashion.

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## Understanding Impact: Emotions

During a traumatic experience, the person's body may release opiates to block physical and emotional pain.

These neurobiological effects can't be controlled and may contribute to unexpected emotional reactions.

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## Understanding Impact: Physical Response

A person's physical response to trauma can also be significantly impacted by neurobiological factors. Tonic immobility (or trauma-induced paralysis) is an autonomic hormonal response that causes the body to freeze in situations that provoke extreme fear.

Resisting or escaping isn't possible for someone experiencing tonic immobility, because they don't have control over their muscle response.

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## Available Resources

When someone reports an incident of sexual misconduct or other traumatic event, it's important to provide them with information about resources that are available on or off campus; including that of the Title IX Coordinator to ensure they receive the support and services that meet their needs.

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## A Student Disclosure

Wren, a freshman, has been one of your most engaged residents. She's friendly and outgoing, and has done a great job of bringing together the dorm floor. But lately you've noticed that she has become more withdrawn, and seems anxious. She missed the last couple RA events you set up, so you decide to leave a note at her dorm room just to check in and offer your support.

A few days later her roommate, Sam, comes to your room and looks incredibly nervous. She says, "I saw your note to Wren, and I'm not supposed to say anything, but I'm worried about her. She's pledging a sorority, and they're having her do some... illegal things. I don't know what to do."



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# Campus Security Policy Statements

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## Campus Security Policy Statements

To inform students and employees, all institutions must have security policies in place. Statements, or summaries, of those policies must be provided in the institution's ASR, including:

- how to report crimes and other emergencies
- when timely warning reports of Clery crimes are made
- how the institution's annual disclosure of crime statistics is prepared
- how to report crimes voluntarily and confidentially
- security and access to campus facilities, including residence halls
- where to find information about registered sex offenders
- emergency notification procedures (and)
- how the institution notifies relevant parties about missing persons



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## Campus Prevention Education Programs

In addition to these statements of policy and campus crime statistics, the ASR must also include descriptions of the following prevention education programs offered by the institution:

- information sessions about security procedures and practices
- programs for students and employees on crime prevention
- drug and alcohol prevention education programs, as required by the Drug-Free Schools and Communities Act of 1989 (and)
- awareness and prevention of dating violence, domestic violence, sexual assault and stalking, as required by the VAWA Amendments to the Clery Act

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## **Distribution of the ASR and AFSR**

The ASR and AFSR must be published and distributed by the institution annually by October 1.

Both current and prospective students and employees, including people who have merely contacted the institution for admissions or employment, must receive the ASR. The reports are also made publicly available.

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## ASR Distribution Basics

The ASR can be distributed in multiple ways as long as it reaches the intended audience. For instance, distribution options include sending the reports through U.S. Mail, campus mail, or email, or notifying students and employees of the report's publication online.

In these communications, the ASR must include a statement about the following:

- the availability of the report
- a list and brief description of its content
- the exact URL for the complete report (and that)
- paper copies will be made available, if requested



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## Ongoing Disclosures

The Clery Act requires the institution to make ongoing disclosures to students and employees that include:

- timely warnings
- emergency notifications
- a daily crime log (and)
- missing student notifications

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## Timely Warnings

The Clery Act requires institutions to notify the campus community – without disclosing identifying information – about Clery Act crimes that are reported to CSAs or local police when:

- pertinent information becomes available (and)
- the institution considers it a serious or ongoing threat to students and employees

The institution's procedures should specify the types of information that should be included in timely warnings.

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## Emergency Notification

When an immediate threat to the health or safety of students or employees occurs on campus, the institution must issue an emergency notification to the affected portion of the campus community that is:

- disseminated through multiple means of communication, such as text message, digital signage, email and flyers on residence hall doors (and)
- given as soon as the institution has sufficient information that will enable people to protect themselves from harm and/or prevent similar crimes

When an emergency notification is issued, a timely warning isn't required for the same incident.

The institution's emergency response and evacuation procedures must be publicized and tested annually to identify and improve any weaknesses.

## Timely Warnings vs. Emergency Notifications

Timely warnings are for Clery Act crimes in the specified geographical areas and they reach the entire campus. Emergency notifications, added through the 2008 amendments to the Clery Act, are broader and allow for segmented notifications in the event of an immediate danger to the campus.

An example of when you may provide a segmented notification to the campus would be if there's a chemical spill in a science lab. In this event, the notification would most likely reach only the area that is affected by the spill.

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## Daily Crime Log

Institutions with a police or security department are required to maintain a daily crime log that documents the nature, date, time and general location of each crime, as well as its disposition, if known. Crimes must be posted to the log within two days.

Information about each incident documented in the log should be accessible to the public and remain open for 60 days, unless it would jeopardize a victim's confidentiality, someone's safety or an ongoing investigation. After 60 days, the crime log should be made available within two business days upon request of the information.

Institutions are permitted to combine the daily crime log with their fire log, but all of the log maintenance requirements remain in effect.

The crime log records all criminal offenses, not just Clery Act crimes. If multiple crimes were committed in a single incident, they are all recorded in the log as the Hierarchy Rule doesn't apply.

## Missing Students Notification Procedure

Clery Act regulations also require an institution to have a missing student notification policy for students who reside in on-campus housing. That policy must include:

- A confidential list of the titles and contact information of people to whom anyone – whether they are students or members of the public – can report that a student has been missing for 24 hours.
- A requirement that these reports get referred to campus security or, if there is no campus security, to the local law enforcement agency. (and)
- An option for students living in on-campus student housing to identify a contact person who will be notified by the institution within 24 hours after the institution determines that the student is missing.

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# Challenges with Compliance

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## Challenges in Implementing the Clery Act

Clery Act compliance requires a significant effort by each institution. Some of the challenges that campuses face in complying with the Clery Act are reflected in the program reviews published by the Department of Education.

These reviews have shown that campuses often fail in:

- identifying proper or complete geography information
- providing policy statements or having complete policies in place to back up the policy statements
- having adequate methods for collection of crime statistics (and/or)
- publishing complete and accurate crime statistics

Some institutions fail to implement the comprehensive prevention education required for Clery Act compliance. This may be due to a lack of institutional support from campus leadership.



## Compliance Challenges: Inaccurate Crime Statistics

Some institutions struggle to comply with the Clery Act's requirement to provide accurate crime statistics.

Institutions often provide inaccurate statistics because they don't have a clear process and consistent method for collecting the statistics in place. For instance, a campus may fail to identify who is required to report, which can result in underreporting.

A campus may also fail to identify those who have a statutory privilege not to report, such as mental health and pastoral counselors.

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## **Compliance Challenges: Inaccurate Crime Statistics (cont.)**

Inaccurate statistics may also arise from an overreporting of sex offense statistics and miscalculated liquor law violations because campuses, students and law enforcement aren't coordinating their efforts.

Lastly, limited information that doesn't include all pertinent information from the reporting parties may cause double counting of incidents because it's difficult to differentiate one from another.

It's absolutely critical that CSAs understand the institution's processes, policies and procedures regarding their reporting duties and responsibilities. This includes the importance of obtaining as much available information as possible when a report is made to ensure the compilation and reporting of accurate crime statistics, and that the ASR and Department of Education statistics match.

## Keys to Compliance

The key to an institution's success in implementing the Clery Act on its campus is to take a multidisciplinary approach. This includes actively involving representatives from multiple departments on campus.

In addition to ensuring accurate reporting, it's the institution's responsibility to:

- coordinate and collaborate on campus among departments
- develop and maintain comprehensive and consistent policies (and)
- justify and document all decisions

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Conclusion

## Summary

The Clery Act requires college and university campuses to disclose campus safety information and statistics. All institutions of higher education, public or private, that participate in federal financial aid programs are obligated to comply with the Clery Act.

The Clery Act includes five key areas:

- the annual security report
- campus crime statistics
- campus security policy statements
- ongoing disclosures (and the)
- VAWA amendments to the Clery Act

You should know how to access your campus resources so you are able to share that information if someone reports a crime to you. CSAs must also follow their institution's policies and procedures to report alleged Clery crimes.

The Clery Act is enforced by the Department of Education. Any institution found to be in noncompliance with the Clery Act may be required to pay a substantial fine per violation.

## Checkpoint

After taking this course, you should be able to:

- Recall the key elements of the Clery Act
- Identify campus security authorities and understand their reporting responsibilities (and)
- Discuss the challenges to comply with Clery Act requirements and understand the keys to compliance

Review these points and repeat this course, if needed.

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## Resources

Clery Center

<https://www.clerycenter.org>

Federal Register

<https://www.federalregister.gov/agencies/education-department>

2020 Clery Act Appendix

<https://www2.ed.gov/admins/lead/safety/cleryappendixfinal.pdf>

U.S. Department of Education: The Handbook for Campus Safety and Security Reporting <http://www2.ed.gov/admins/lead/safety/handbook.pdf>



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