Ensuring Administrative Capacity to Address Clery Act Compliance
A Campus Example
Shanieka S. Jones, M.S.

- Clery Director, Cal State Monterey Bay
- Ten years in campus safety
  - DHR Investigator, Cal State Monterey Bay
  - Crime Prevention & Clery Compliance Specialist, Cal State Monterey Bay
  - Records Manager, Virginia State University
  - Parking Services Coordinator, Virginia State University
- Enrolled in Ph.D. in Public Policy & Administration at Walden University
Objectives

• Understand foundational needs for program administration
• Identify stages of team development and considerations to productivity
• Review campus example
• Develop initial plan for identifying noncampus Clery geography
Use ONE word to describe your best work-related team experience.
# Clery Act

<table>
<thead>
<tr>
<th>Who:</th>
<th>Campus Security Authorities, to include University Police Local Law Enforcement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where:</td>
<td>Clery Act Geography</td>
</tr>
<tr>
<td>What and How:</td>
<td>Annual</td>
</tr>
<tr>
<td></td>
<td>• Annual Security Report</td>
</tr>
<tr>
<td></td>
<td>• Statistics submission to the Department of Education</td>
</tr>
<tr>
<td></td>
<td>Ongoing</td>
</tr>
<tr>
<td></td>
<td>• Disclosures (Timely Warnings, Emergency Notifications, Daily Crime Log)</td>
</tr>
<tr>
<td></td>
<td>• Rights and options for victims/survivors of dating violence, domestic violence, sexual assault and stalking</td>
</tr>
<tr>
<td>Enforcement:</td>
<td>U.S. Department of Education (DoE) Clery Compliance Division</td>
</tr>
</tbody>
</table>
Clery Act

- Clery Act Geography
- UPD, other Campus Security Authorities & Local Law Enforcement
- Statistics and Disclosures
Effects of Noncompliance

- Filed complaints or litigation
- A suspension or limiting of the institution’s Title IV funding
- The Department of Education may issue a civil fine up to $58,328 per violation per occurrence
- Negative media attention
  - Pennsylvania State University
  - Michigan State University
  - University of North Carolina, Chapel Hill
Noncampus Property

• 34 C.F.R. § 668.46(a)

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 an 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.
Administrative Capability

Dedicated

Collaborative

Reconciled

Written policy & procedure

Expertise

Thorough

Action Plans

Records Schedules

34 C.F.R. § 668.16
Composition
Organizational Structure
Governance
Administration
Relationships
Knowledge
Communication
Project Management
Campus Process

Inputs
- What are the available resources?
  Are there enough?

Activities
- What are the tasks that need to be performed?

Outputs
- What are we setting to accomplish from immediately completing these tasks?

Outcomes
- What are our intermediate goals?

Impacts
- What is the change we are trying to accomplish?
Growth and Expansion

2015
- June – Clery Compliance Advisory Committee Launch

2016
- September – Community Buildout with Dean of Students Office and Outdoor Recreation

2017
- January – Awareness (Athletics)
- March – Awareness (IP) April – Awareness (Dean of Students Office, Student Activities & Leadership Development, Student Union)
- November – Process Mapping

2018
- February – On-boarding (University Corporation and TRiO)
- June – On-boarding (Housing and EOSP)
- July – Onboarding (Associated Students new hire pro-staff)
- September – Awareness (Academic Leadership Team)
Process Overview

- Review Event and Travel Requests submitted by Student Groups
- Use Community to send Quarterly “Invoices”
- Use Travel Expense Claims to submit “Limit-of-Control” Data
- Include activities that meet definition but do not require Community
- Reconcile via Google
- Deadline for complete, reconciled and finalized data is FEB 1.

Community + Direct Input = Final Product - Noncampus Properties
Community Process - Step 1

When students complete a travel request, the following questions are included (* denotes user-friendly definition included):

- Event Title and Requestor
- Requestor Contact Info
- Address
- Start Date
- Is your group or organization traveling to a noncampus property*? (Yes or No)
- Is your group or organization staying at the location for more than one night? (Yes or No)
- How many days is your group or organization staying at the location? (Number required)
- How many nights will your organization spend at the location? (Number required)
- Does your group or organization frequently use* this location for its events? (Yes or No)
- How many days do you estimate your group or organization will spend at this location this school year? (Number required)
- How many days do you estimate your group or organization will spend at this location next school year? (Number required)
## Community Process - Step 2

These are determinations based on the Community Request. The TEC for these events should be used to submit 'limit of control data' to the CCO. Click the hyperlink to be redirected to the submission sheet. Determinations are done on a Quarterly Basis. Departments will be notified when determinations are completed.

### Event Log

<table>
<thead>
<tr>
<th>Event Title</th>
<th>Event Requester</th>
<th>Requester Contact Info</th>
<th>Event Status</th>
<th>Event Location</th>
<th>Street</th>
<th>City</th>
<th>Zip</th>
<th>Type</th>
<th>City</th>
<th>Start Date</th>
<th>Start Time</th>
<th>Created</th>
</tr>
</thead>
<tbody>
<tr>
<td>No added &amp; more travel since last quarter's assessment on 4/3/2018. BCC only has 13 2018 Community entries that meet that criterion. 5 of which are on-campus travel that require information. If this is an error, please advise. The following travel represents facilities where it appears 'repeated use is met.'</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Equestrian Club, Equestrian Club</td>
<td><a href="mailto:etsbequestor@gmail.com">etsbequestor@gmail.com</a></td>
<td><a href="http://www.etsbequestor.com">http://www.etsbequestor.com</a></td>
<td>Active</td>
<td>Dos Equis Stables 300 W 5th California</td>
<td>93924 Address</td>
<td>Carmel</td>
<td>1/29/2018</td>
<td>9:30 AM</td>
<td>Yes</td>
<td>0</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Equestrian Club, Equestrian Club</td>
<td><a href="mailto:etsbequestor@gmail.com">etsbequestor@gmail.com</a></td>
<td><a href="http://www.etsbequestor.com">http://www.etsbequestor.com</a></td>
<td>Active</td>
<td>SPCA Indian Springs 22600 Indi California</td>
<td>93908 Address</td>
<td>Salinas</td>
<td>1/29/2018</td>
<td>8:00 AM</td>
<td>Yes</td>
<td>0</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Equestrian Club, Equestrian Club</td>
<td><a href="mailto:etsbequestor@gmail.com">etsbequestor@gmail.com</a></td>
<td><a href="http://www.etsbequestor.com">http://www.etsbequestor.com</a></td>
<td>Active</td>
<td>Wishing Wall Ranch 72562 Sch California</td>
<td>93923 Address</td>
<td>Carmel</td>
<td>1/29/2018</td>
<td>11:00 AM</td>
<td>Yes</td>
<td>0</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Rock climbing at Pinnacles 2/23/18</td>
<td><a href="mailto:etsbequestor@gmail.com">etsbequestor@gmail.com</a></td>
<td><a href="http://www.etsbequestor.com">http://www.etsbequestor.com</a></td>
<td>Active</td>
<td><a href="mailto:outdoor@ctsmb.edu">outdoor@ctsmb.edu</a></td>
<td>California</td>
<td>95043 Address</td>
<td>2/23/2018</td>
<td>12:00 AM</td>
<td>Yes</td>
<td>0</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Rock climbing at Pinnacles 3/5/18</td>
<td><a href="mailto:etsbequestor@gmail.com">etsbequestor@gmail.com</a></td>
<td><a href="http://www.etsbequestor.com">http://www.etsbequestor.com</a></td>
<td>Active</td>
<td><a href="mailto:outdoor@ctsmb.edu">outdoor@ctsmb.edu</a></td>
<td>California</td>
<td>95043 Address</td>
<td>3/5/2018</td>
<td>12:00 AM</td>
<td>Yes</td>
<td>0</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Rock climbing at Pinnacles 4/13/16</td>
<td><a href="mailto:etsbequestor@gmail.com">etsbequestor@gmail.com</a></td>
<td><a href="http://www.etsbequestor.com">http://www.etsbequestor.com</a></td>
<td>Active</td>
<td><a href="mailto:outdoor@ctsmb.edu">outdoor@ctsmb.edu</a></td>
<td>California</td>
<td>95043 Address</td>
<td>4/13/2018</td>
<td>12:00 AM</td>
<td>Yes</td>
<td>0</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Community Process - Step 3 & 4

<table>
<thead>
<tr>
<th>Event Name</th>
<th>Event Requestor</th>
<th>Name of Location Owned or Controlled by CSUMB or Student Organization</th>
<th>Street Address</th>
<th>City/Province/State, etc.</th>
<th>Postal Code</th>
<th>Start Date</th>
<th>Start Time</th>
<th>End Date</th>
<th>End Time</th>
<th>Hours of Facility Students Resided</th>
<th>Local Police Department Name and Complete Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undoc-LOtters Retreat</td>
<td>Undoc-LOtters</td>
<td>Wonder Valley Ranch Resort and Conference Center</td>
<td>6450 Elwood Road</td>
<td>Sanger, CA</td>
<td>93567</td>
<td>3/9/2018</td>
<td>3:00 PM</td>
<td>4/1/2018</td>
<td>2:00 PM</td>
<td>First Floor, Cedar Hall</td>
<td>Sanger Police Department, 7th Street, Sanger, CA 93587</td>
</tr>
<tr>
<td>Canceled Events</td>
<td>Cru Winter Conference</td>
<td>Campus Crusades for Christ (Cru)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>
This sheet includes 2017 properties that are now noncampus property because they meet the repeated use standard.
Results

Domestic Travel

CA, 120

International Travel

Spain, 3

Brazil, 1

Costa Rica, 1

Italy, 1

Norway, 1
Training Elements

• Departments should be adding information based on the stay as it has happened.

• Third-party booking sites (e.g., Travelocity, Priceline, etc.) may not provide room numbers on the confirmation or receipt.

• These are supporting records.
Key Points

**Foundational Needs**
- Conditions
- Inputs

**Team Development**
- Relationship Continuum
- Administration

**Campus Example**
- Self-assessment

**Next Steps**
- Mapping
- Education
Recommendations

No Committee

- Define culture and find strategy for support
- Categorize offices and contacts (stakeholders)
- Build relationships through education and awareness
- Identify pre-existing structures and create processes with collective input

Committee

- Conduct a process debrief or evaluation
- Document gaps and preliminary plans for resolution
- Advance institutionalized effort
- Cross-train