

## Clery Act Compliance

### 2016 (covering CY2015) Annual Security Report Review

After a thorough review of the 2016 (for calendar year 2015) and the 2015 (for calendar year 2014) Annual Security Reports (ASRs) and the 2016 Handbook for Safety and Security Reporting, the following assessment of compliance with Clery Act requirements is offered. All requirements in the chart below are contained in Appendix C: Checklist for Campus Safety and Security Compliance in the 2016 Handbook for Safety and Security Reporting. The assessment results are divided into four categories:

- **Compliance Concerns**, which are items that need to be addressed to ensure compliance.
- **Recommendations for Improvements**, which are items that may be compliant but could be improved.
- **Recommendations for Improvements to Clery Processes**, which are improvements that could be made to the processes concerning Campus Security Authorities (CSAs) and the development of the ASR.
- **Other Clery Requirements**, which are Clery requirements outside those mandated for the Annual Security Report.

Compliance Concerns			
	Requirement	ASR Reference	Comments
1	Policy for preparing annual disclosure of crime statistics	No reference in ASR	We need to have internal documentation of process. Verify this exists and that it is the process being followed.
2	Security considerations used in the maintenance of campus facilities	No reference in ASR	
3	Documentation on rationale used for determining CSAs	No reference in ASR other than general guidance provided in Handbook	This is particularly important as we change our processes for CSAs. We should be able to state our logic for identifying CSAs and show the CSA list follows that logic.
4	Description of primary prevention and awareness programs for all incoming students and new employees concerning dating violence, domestic violence, sexual assault and stalking	2016 ASR – page 25	Brief mention of general education and awareness being offered but doesn't describe an overall program for either students or new employees. Include Haven training for students here.
5	Description of safe and positive options for bystander intervention and information on reducing the risk of sexual violence	No reference in ASR	Bystander intervention training for students is taking place but nothing mentioned in ASR.

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Compliance Concerns			
	Requirement	ASR Reference	Comments
6	Statement advising the campus community where law enforcement agency information provided by a state concerning registered sex offenders may be obtained	2016 ASR – Page 39	
7	Coordination of Drug/Alcohol Biennial Reviews	2016 ASR – page 1	Clery Coordinator should be coordinating this. There needs to be clarification on roles to ensure compliance. Next Biennial Review is due by December, 2017.
8	Unfounded Crimes	No reference in ASR	Beginning in 2015, ASR to include total number of crime reports that were “unfounded” and subsequently withheld from crime statistics during each of the three most recent calendar years.

Recommendations for Improvements to ASR			
	Requirement	ASR Reference	Comments
1	Written timely warning policy	2016 ASR – page 4	In the ASR we have guidelines that define the process for issuing timely warnings but we don’t have a written policy.
2	Description of programs designed to inform students and employees about prevention of crimes	2016 ASR – page 4	In the ASR there is a brief paragraph stating we deliver crime prevention programs and materials to employees and students; however, there is no detail or description of the programs or intended outcomes for programs. There should be information about Active Shooter course. Recommend that PSEMSG be tasked with developing program goals.
3	Crime definitions	2016 ASR - page 14	Crime statistics charts list forcible and non-forcible sex offenses, however; definitions of sex offenses doesn’t mention what is considered forcible and non-forcible.

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Recommendations for Improvements to ASR			
	Requirement	ASR Reference	Comments
4	List of CSAs	2016 ASR – page 7	<p>Some titles still reference Student Services instead of Student Affairs.</p> <p>There is no longer a Chief Enrollment Services and Financial Aid Officer position.</p> <p>The SVP for Student Affairs is listed but not the other SVPs.</p> <p>Rockville Campus doesn't have the Instructional Deans listed like the other campuses.</p> <p>Rockville campus is missing the Evening and Weekend Office.</p>
5	Sexual Assault Prevention Programs	2016 ASR – page 27	<p>Only events offered by Student Life are listed; however, there were events offered by the Title IX Office, Women's Studies and others that should be included.</p> <p>How are we tracking the events throughout the year to include a comprehensive list in the upcoming ASR?</p>

Recommendations for Improvements to Clery Processes		
	Requirement	Comments
1	Form Clery Team to coordinate development of ASR	A team approach is best to coordinating this report. Get everyone together early (suggest the month of May) and talk about what each person needs to provide and when it is needed. A project plan should be created each year outlining team member responsibilities and deadlines. Share the project plan with Compliance.
2	Document both the CSA process and the ASR process.	This will help when changes in personnel occur.
3	Consider using established Clery checklists offered through the Clery Handbook or other professional associations.	Give each team member a checklist for their area of responsibility. This will make it easier to track that all requirements are included in the final ASR.
4	Review of Final Draft of ASR	Final draft should be reviewed by all team members, General Counsel, Compliance, and senior leadership prior to editing by Communications team.

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Recommendations for Improvements to Clery Processes		
	Requirement	Comments
5	Allow enough time for Communications to edit	Allow at least 3-4 weeks for Communications to edit document.
6	Conduct lessons learned review each year after ASR has been completed.	Incorporate changes from previous year lessons learned.

Other Clery Requirements		
	Requirement	Comments
1	Procedure in place for collecting and reviewing crime reports from CSA	Verify we have a written procedure and follow it. Recommend that this procedure needs to be documented. Guidance doesn't state if this is required to be included in ASR or simply available
2	Request statistics from local law enforcement of ALL Clery geographic areas	Cannot determine without verification
3	Document your institution's efforts to obtain statistics from local law enforcement	Cannot determine without verification
4	Hard copy or electronic crime logs contain the following: <ul style="list-style-type: none"> <li>• Nature of crime</li> <li>• Date and time of crime</li> <li>• General location of crime</li> <li>• Disposition of the complaint</li> </ul>	Cannot determine without verification
5	Maintain a backup log for electronic logs	Cannot determine without verification
6	More than one person trained to maintain logs	Cannot determine without verification
7	Notify public how they can review crime logs	Cannot determine without verification

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