

INSTITUTIONALIZING THE CLERY ACT AT INSTITUTIONS OF HIGHER EDUCATION

Findings of a Focus Group
of College and University Compliance Executives

Sponsored by the
National Center for Campus Public Safety

May 2016



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This project was supported by Grant No. 2013-MU-BX-K011 awarded by the Bureau of Justice Assistance. The Bureau of Justice Assistance is a component of the Office of Justice Programs, which also includes the Bureau of Justice Statistics, the National Institute of Justice, the Office of Juvenile Justice and Delinquency Prevention, the Office for Victims of Crime, and the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering and Tracking. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice.

Executive Summary

Under the Clery Act, all colleges and universities receiving federal funding must share information about crime on and around campus and their efforts to improve campus safety. They must also provide support for certain crime victims and disclose certain crime-related policies and procedures. However, the complexity of the legislation, resource limitations, and changes in the Act have created considerable compliance challenges for many institutions of higher education (IHEs).

On January 12, 2016, nineteen public safety and compliance executives from eight IHEs and nine professional associations, with support from the National Center for Campus Public Safety (NCCPS) and the Clery Center for Security On Campus, gathered at the National Center for Higher Education in Washington, D.C. for a one-day focus group. Their goal was to help IHEs develop their cultures to manage compliance with the Clery Act from an institution-wide team approach, rather than something sequestered to a few compliance professionals at each IHE. The primary task was to determine what kinds of communications could make that growth occur.

The focus group convened in response to the NCCPS's effort to be a nationwide resource for addressing critical issues in campus safety. The focus group addressed three objectives IHEs and professional associations have with regard to institutionalizing Clery compliance: identify what messages IHEs and professional associations should send about the topic, determine how those messages should be distributed, and decide how to execute on those determinations. The focus group also discussed topics related to personnel management, training, and funding related to expanding the scope of Clery compliance at IHEs. The discussion did not evaluate specific compliance efforts at particular institutions, nor did it evaluate policies at specific institutions.

Informing the conversation were the results of a previous focus group conducted in November 2015 of eighteen participants representing twelve IHEs. Supported by the NCCPS, that focus group and a corresponding summary report shared thoughts about buy-in and support solutions, the structure of those solutions, and communications around those solutions. In turn, the January focus group developed a broad array of factors, tactics, and strategies. A series of core principles emerged:

- IHEs need total buy-in from campus leaders and administrators to institutionalize Clery compliance, including mid-level leaders.
- IHEs want help developing communications plans to get that buy-in.
- IHEs are struggling to reconcile compliance tasks with the spirit of the Clery Act.
- How IHEs and professional associations communicate the importance of institutionalizing Clery compliance has a significant impact on whether those messages are heard and whether cultural growth occurs.

Background

Crime — some of it violent — occurs on virtually every college and university campus. According to the most recent available data from the U.S. Department of Education, more than 4,000 sex offenses occurred every year between 2012 and 2014 on college and university campuses with student residential facilities, for example. In addition, there were at least 1,200 robberies in each of those years, more than 3,000 motor vehicles stolen annually, and at least 13,000 burglaries per year.¹

Crimes like these and others threaten the lives and well-being of students, faculty, and staff and can disrupt and negatively impact the campus learning environment. The Clery Act requires all IHEs receiving federal Title IV student financial assistance programs to annually report statistics on these and other types of crime to the public.

The Clery Act has three primary requirements: report campus crime data; provide support for victims; and maintain and communicate policies and procedures related to disseminating warnings and notifications, options for crime victims, and crime-reporting processes.

Though IHEs overwhelmingly support the spirit of the Clery Act and are dedicated to providing safe environments for students, faculty, and staff, complying with all aspects of the Clery Act can be a challenge for many IHEs.

For example, some of the Clery Act's guidelines seem to conflict or intersect with other federal and state laws IHEs must follow. These laws often define certain terms differently and have different standards. Frequent changes in the laws require continuous retraining for compliance officials and administrators.

These struggles, combined with worries over program reviews and fines for noncompliance, as well as challenges with data collection and management, limitations in funding and personnel, and differences in the interpretation or prioritization of certain compliance standards, have encouraged many IHEs to lose sight of the spirit of the law and focus resources entirely on the letter of the law. For many IHEs, this has shifted the goal away from comprehensive campus safety and student success and toward creating “perfect” data collection and annual reporting systems that avoid scrutiny.

About the Clery Act

The Clery Act honors the memory of Jeanne Clery, who was a student at Lehigh University in Bethlehem, Pennsylvania. In April 1986, she was raped, beaten, and killed in her dorm room.

After her death, Jeanne's parents, Connie and Howard Clery, discovered 38 undisclosed violent crimes had occurred on the campus in the three years before their daughter's murder.

In 1987, the Clerys formed Security On Campus, Inc., now the Clery Center for Security On Campus, and began lobbying for laws requiring schools to disclose information about crimes on campuses.

In 1990, four years after Jeanne's tragic death, the Jeanne Clery Act became law.



Jeanne Clery (1966-1986)

¹ <http://ope.ed.gov/security/Index.aspx>; search includes campuses in any U.S. state or outlying area with student residential facilities.

Many of the problems IHEs face when it comes to Clery compliance also have a common denominator: Clery compliance is not an institutional objective; rather, it is a task assigned to an often small compliance team or individual in the lower levels of an IHE's hierarchy.

The National Center for Campus Public Safety (NCCPS) has taken the lead in understanding the challenges of institutionalizing Clery compliance and identifying solutions to those challenges. Established in 2014, the NCCPS is a clearinghouse for information, research, training, promising practices and emerging issues in campus public safety. The NCCPS's mission is to connect all forms of campus public safety, professional associations, advocacy organizations, community leaders, and others to improve and expand services to those who are charged with providing a safe environment on the campuses of the nation's colleges and universities.

Participants

On January 12, 2016, the following public safety leaders, compliance executives, and professional association representatives convened at the National Center for Higher Education in Washington, D.C. for the focus group:

- **Jeff Allison**, Strategic Partnerships Coordinator, National Center for Campus Public Safety
- **Charles Ambrose**, President, University of Central Missouri
- **Claudia Archer**, Clery Act Compliance and Survivor Resource Specialist, University of California-Berkeley
- **Geoffrey Bartlett**, Deputy Director of Public Safety and Director of Emergency Management, Tufts University/IAEM-UCC
- **Joan Berkes**, Senior Policy Analyst, National Association of Student Financial Aid Administrators
- **Chantelle Cleary**, Title IX Coordinator, University at Albany
- **Alan Davis**, Executive Director, VTV Family Outreach Foundation
- **Laura Egan**, Director of Training and Technical Assistance, Clery Center for Security On Campus
- **Brent Ericson**, Coordinator, Sexual Misconduct and Title IX, Association for Student Conduct Administration/Assistant Dean of Students and Director of Student Conduct, George Mason University
- **Jaimee Gilford**, Director of Clery Compliance, University of Wisconsin
- **Cynthia Love**, Executive Director, American College Personnel Association
- **Jim Lyon**, Vice General Chair, International Association of Chiefs of Police University & College Police Section/Chief, Northeastern Illinois University Police Department
- **Terry McCauley**, Public Safety Director, Oakland Community College
- **Donna McMahan**, President, University Risk Management & Insurance Association/Assistant Director and Risk Manager, University of Maryland
- **Andrew Morse**, Director for Public Policy Research and Advocacy, NASPA-Student Affairs Administrators in Higher Education
- **Aran Mull**, Deputy Chief of Police, University at Albany
- **Michael Phibbs**, Chief of Police, Auraria Campus
- **Scott Rhoad**, Director of Public Safety, University of Central Missouri
- **Kim Richmond**, Director, National Center for Campus Public Safety
- **Janet Roberts**, Executive Director of Marketing, Oakland Community College
- **Theresa Stephens-Lock**, Executive Director, Department of Public Safety, Mott Community College
- **Andrea Young**, Training and Technical Assistance Coordinator, National Center for Campus Public Safety

Discussion

Working through the key issues identified by the focus group, the participants discussed challenges and promising solutions around turning Clery compliance into an institution-wide activity for IHEs. This section summarizes their discussion.

The Culture of Clery Compliance

The NCCPS November focus group and subsequent report highlighted a number of challenges and barriers to making Clery compliance an institution-wide activity for many IHEs that was used as the basis for initial discussion in this January focus group.

Specifically, participants said that at many IHEs, the Clery Act has in many regards become just “one more regulation” to deal with. Additionally, participants said IHE staff members and administrators, other than those directly responsible for compliance activities, often don’t know enough about the law to realize the consequences of compliance lapses.

Perhaps the biggest challenge for IHEs today, according to the participants of the November focus group, is that inconsistencies among the Clery Act, Title IX, and state laws have made Clery compliance overwhelming, time-consuming, expensive, ineffective, and resource intensive.

From the focus group:

“It’s almost impossible to be compliant with Clery...people operate in a state of fear.”

For many IHEs, these challenges have created a culture of compliance that prioritizes report writing and data management over the more comprehensive goals of ensuring that campuses are safe for students, faculty, and staff. In other words, IHEs seem to be facing tough choices when it comes to following the spirit of the law versus following the letter of the law.

Using the findings in the November 2015 report, participants identified five strategies for addressing these challenges:

1. Widen the scope of Clery compliance to facilitate cultural buy-in.
2. Improve the communications that IHEs send regarding Clery compliance in order to educate the campus community.
3. Improve the nature and frequency of Clery compliance training on campus in order to make compliance more efficient.
4. Increase the degree of regulatory and data standardization and alignment in order to ensure IHEs don’t inadvertently fall out of compliance.
5. Focus more on student safety and success in order to honor the spirit of the Clery Act.

Focus group participants determined that these strategies drive the communications efforts IHEs and professional associations should make in order to institutionalize Clery compliance.

Solutions: From Ideas to Execution

The participants of the January 2016 focus group agreed with the participants of the November 2015 focus group that the following solutions will significantly help IHEs create a culture of Clery compliance. The solutions fall into three categories.

Buy-In and Support Solutions

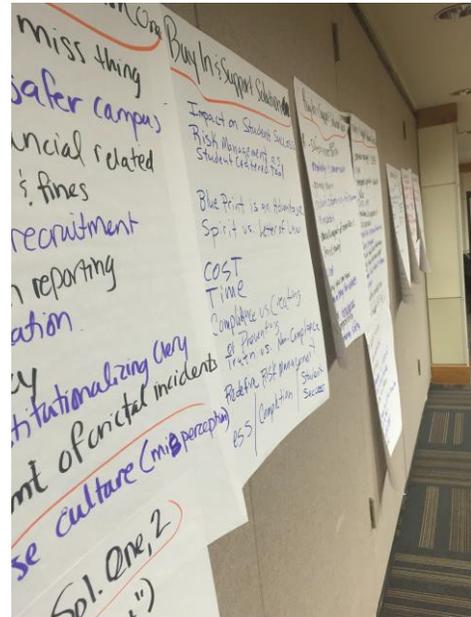
- Build a campus culture that demonstrates support for the Clery Act and encourages people to understand the law and the reporting process.
- Train students, employees, and other stakeholders about the Clery Act and explain to them how reporting will help build a safer, more secure campus.
- Ensure that a trusted Clery Act subject matter expert is at all crime- or compliance-related meetings and on relevant committees. Ensure that person has a direct line of communication to the highest administrative levels, up to and including the president or chancellor.

Structural Solutions

- Form interdisciplinary teams from across the institution that meet regularly. Maintain one office that has final, official responsibility for Clery compliance.
- Have full-time, dedicated personnel to support these efforts, and ensure funding is available to retain those personnel. Consultants could help with training and organization as well as compliance and program reviews.
- Take advantage of software and other technology to help prepare Clery reports and assist in program reviews.

Communications and Public Information Solutions

- Create communications plans that help institutionalize Clery compliance, and periodically evaluate and adjust those plans.
- Create community partnerships with local law enforcement, advocates, and agencies, and utilize them as spokespeople when an incident occurs. Create an educated pool of student leaders who can serve as ambassadors and can help develop those awareness and prevention campaigns.



Buy-In and Support Solutions

The participants discussed the advantages and disadvantages of three solutions in this category. They then formulated a message around each solution that IHEs and professional associations could disseminate to help institutionalize Clery compliance.

► **Buy-in and support solution #1: Build a campus culture that demonstrates support for the Clery Act and encourages people to understand the law and the reporting process.**

The focus group said this solution has several advantages.

- *Team coverage.* Involving more people in Clery compliance reduces the chances an IHE will “miss something” in its compliance activities and provides a format for inclusive campus safety discussions.
- *Financial savings.* Reducing the risk of Clery violations in turn lessens the risks that IHEs will be fined or incur other financial liabilities.
- *Improved reporting accuracy.* Having more people across campus thinking about Clery compliance improves the quality of data collection and reporting.
- *Stronger IHE reputation for transparency.* Clery compliance across campus can help disseminate knowledge and build trust.

There are disadvantages to this approach, however. Emphasizing a Clery compliance culture can inadvertently create a more risk-averse culture at an IHE, the participants noted. Emphasizing Clery reporting could also increase the number of reported incidents on a campus, for example, which could make an IHE’s campus appear less safe. Additionally, cultural initiatives require time and money.

From the focus group:

“If the playing field is level and you’re going with the spirit [of the Clery Act], are you maybe making yourself look on paper worse than another campus that was not following the spirit of the law?”

Ultimately, the participants determined that sending the following message to campuses reflects these ideas:

“Compliance with the Clery Act demonstrates that a campus is listening to and caring for its students.”

► **Buy-in and support solution #2: Train students, faculty, and other stakeholders about the Clery Act and explain to them how reporting will help build a safer, more secure campus.**

Advantages of this tactic, according to the focus group, are the following:

- *Empowers more people to embrace Clery compliance.* The more people know about Clery, the more likely they are to incorporate it into their everyday decision-making, which accelerates the spread of the culture of compliance.
- *Creates an opportunity to explain the process.* Focus group participants said most IHE staff and faculty members know little to nothing about the Clery Act. By providing information about what the Act is, how it works, and why it matters, the IHE may encounter less resistance to reporting and other activities associated with compliance.

There are disadvantages to this approach, however. Training takes time and money, and IHEs will have to provide constant, consistent training due to regulatory changes and employee turnover.

Furthermore, faculty and staff members may feel burdened by the additional responsibility of knowing and incorporating Clery compliance into their positions.

Ultimately, however, the participants determined that sending the following message to campuses reflects these ideas:

“Demonstrating knowledge about Clery compliance is one way high-performing faculty and staff members raise the value of our institution, increase our involvement in the campus community, and show the members of that community how much we value them and their safety.”

► Buy-in and support solution #3: Ensure that a trusted Clery Act subject matter expert is at all crime- or compliance-related meetings and on relevant committees. Ensure that person has a direct line of communication to the highest executive levels, up to and including the president or chancellor.

Ensuring that someone with Clery Act expertise sits in on meetings involving crises, risk, or emergency management can also help institutionalize Clery compliance, according to the focus group. There are several advantages to this:

- *The message that Clery compliance is important stays consistent.* The constant presence of a Clery subject-matter expert reinforces that Clery touches every facet of the IHE. It also helps those who are slow to embrace institutionalizing Clery compliance see that the IHE is dedicated to the idea and sees it as part of its mission.
- *It strengthens relationships among campus departments.* Having someone in the room who knows the difference between an arrest and a referral, for example, builds trust from other members of a meeting or response team. Clery SMEs can also give staff and faculty a way to provide feedback regarding specific struggles departments may have with compliance or the unintended consequences of compliance.

There are disadvantages to this approach, however. IHEs may be tempted to assume one Clery expert can go to all relevant meetings and respond to what comes of them. Additionally, subject matter experts will have tremendously valuable knowledge about the IHE’s Clery compliance; IHEs may have to work harder to retain that talent. The constant presence of Clery subject matter experts may also inadvertently send the message that the IHE is extremely concerned about liability rather than student safety and success.

Ultimately, however, the participants determined that the following message reflects these ideas:

“Developing and deploying Clery expertise reflects our commitment to the safety and security of our institution and adds value to all of our teams.”

Structural Solutions

The participants discussed the advantages and disadvantages of three solutions in this category. They then formulated a message around each solution that IHEs and professional associations could disseminate to help institutionalize Clery compliance.

► **Structural solution #1: Form interdisciplinary teams from across the institution that meet regularly. Maintain one office that has final, official responsibility for Clery compliance.**



Many participants felt that although administrators tend to have negative perceptions about committees, encouraging IHEs to form teams could significantly accelerate cultural changes that create widespread buy-in on institutionalizing Clery compliance.

The teams should be multidisciplinary with members from various campus departments. Doing so creates an opportunity to expose more members of the campus community to the realities of Clery compliance. Those team members may also serve as advocates for compliance-related thinking within other campus departments and communities.

Participants said the primary tasks of these teams would be to create coherent messages intended for dissemination to the rest of campus regarding the nature and importance of complying with the Clery Act, as well as to develop collective goals for the IHE, share knowledge with other administrative bodies, and simplify the compliance process.

Clery compliance teams have several potential advantages, according to the focus group:

- *They develop collective goals.* Because interdisciplinary teams bring a variety of expertise and priorities to the table, the goals they set span a wider spectrum of priorities from all over campus.
- *They help create coherent messages.* Getting input from a more diverse group ensures that messages make sense for more campus populations.
- *They socialize knowledge.* Interdisciplinary teams by definition come from all over campus and have a variety of communication channels through which they can gather and share knowledge about Clery compliance.
- *They break down complexity.* Interdisciplinary teams can streamline communication between departments and other groups represented on those teams, making it easier to get things done.
- *Better incident management.* Clery teams can bring together bright minds from across the IHE, who can then provide additional help and response support for reportable events.
- *Focuses on the spirit of the Clery Act.* Because Clery compliance team members are from all over campus, they can help IHEs take a more comprehensive approach to student safety and success.

The focus group also recognized that these teams could have drawbacks, including added costs, more meetings for administrators to attend, and the risk that a shift in focus from data management and reporting to following the spirit of the Clery Act could have reputational consequences. Ultimately, however, the participants determined that the following message reflects these ideas:

“Having a Clery team is critical to a successful Clery program and a safer campus.”

► **Structural solution #2: Have full-time, dedicated personnel to support these efforts, and ensure the funding is available to retain those personnel. Consultants could help with training and organization as well as compliance and program reviews.**

Participants said this solution would give IHEs time to develop in-house Clery expertise, creating several advantages:

- *Ensures messaging is consistent and constant.* Dedicated Clery support would reduce or eliminate the ad hoc “compliance roulette” many IHEs play, according to the focus group.
- *Provides a higher return on compliance investments.* Though talent isn’t cheap, it is usually less expensive than paying compliance-violation fines to the Department of Education.

Participants noted that budget constraints could hinder adoption of this tactic at many IHEs. Additionally, participants noted that many IHEs are risk-tolerant regarding Clery compliance and may prefer to risk compliance violations rather than incur the cost of additional personnel.



Ultimately, however, the participants determined that the following message reflects these ideas:

“Appointing dedicated employees to Clery compliance and programming creates expertise in leadership. IHEs should dedicate an appropriate percentage of certain positions to these tasks, commensurate with institution size, complexity, and budget.”

► **Structural solution #3: Take advantage of software and other technology to help prepare Clery reports and assist in program reviews.**

Clery compliance can’t be fully automated; there will likely always be a human element involved. However, a variety of software and technology solutions can help IHEs gather, filter, and report data. This has several advantages, the largest of which are the following:

- *Standardizes the data.* This makes the data more comparable year to year and thus easier to analyze.
- *Saves time and reduces errors.* Manually tallying data and relying only on spreadsheets takes a long time and is very susceptible to errors. Wider use of software and technology solutions can reduce both impediments.

Participants noted that technology can be expensive and can take time to research and implement. Ultimately, however, the participants determined that the following message reflects these ideas:

“With the recognition that Clery compliance should not be fully automated, IHEs should use software to enhance and streamline the mechanics of Clery compliance.”

Communications and Public Information Solutions

Participants identified several key elements of IHE communications plans that would be used to develop a culture of Clery compliance.

From the focus group:

“My cops get it. The administration heads get it. The missing part is everybody in between.”

Identifying the audience from which IHEs seek buy-in is important. On the surface, there appear to be two: leaders who are already aware of the importance of compliance in general, if not specifically, around the Clery Act; and support personnel, who often are not aware of the importance of the IHE’s compliance efforts or their role in those efforts. Each audience may require different communications to gain buy-in.

► **Communications and public information solution #1: Create communications plans that help institutionalize Clery compliance, and periodically evaluate and adjust those plans.**

The focus group noted that IHEs and professional associations can’t simply decide to say more about Clery compliance if they hope to change the culture of IHEs. They must devise written plans that detail when, how, and to whom they’ll talk about compliance, as well as through what channels.

The focus group participants noted what professional associations and IHEs believe are the best channels for receiving and/or communicating messages about Clery compliance.

Professional Associations	Institutions of Higher Education
Social media	Listserv posts by credible contributors; websites of other IHEs or organizations
Regular newsletters	Regular newsletters, memos
Peer reviewed or invited scholarship	Legislation and legislative documents
Mainstream media, blogs, or other electronic news	Mainstream media, blogs, or other electronic news
Research projects	Student feedback and complaints
Online learning/webinars	Internal training
Conferences for professional development	Conferences for professional development
Paid consultations that provide technical assistance or expertise	Professional organizations and networks, direct contact from personnel and peers
Strategic partnerships with other organizations	Department of Education Clery program reviews
Shared communications calendar	High-level meetings, staff meetings, town halls
Needs and process surveys	Focus groups

Communications plans have several potential advantages, according to the focus group:

- *They’re in writing.* A written plan creates structure and consistency in what IHEs communicate about Clery compliance.
- *They force IHEs to identify Clery stakeholders.* A key part of formulating communications plans is determining who the audience is, which encourages IHEs to think about what populations are most interested in and affected by Clery compliance.
- *They create more consistent responses and compliance.* When IHEs put a communications plan in writing, they make it easier for the IHE to ensure that it communicates the “right”

information, as well as make it easier to endure personnel turnover, organizational changes, and shifts in crucial parts of the compliance process.

The focus group also recognized that communications plans have a reputation for being vague and could inadvertently have a chilling effect on what people are willing to say about what is happening on a campus.

Ultimately, however, the participants determined that the following message reflects these ideas:

“Written communications plans support Clery compliance, improve campus safety, and ensure that stakeholders get the right information.”

► Communications and public information solution #2: Create community partnerships with local law enforcement, advocates, and agencies, and utilize them as spokespeople when an incident occurs. Create an educated pool of student leaders who can serve as ambassadors and can help develop those awareness and prevention campaigns.

The focus group noted that transparency is a common challenge with Clery compliance. Engaging the community more thoroughly and carefully can address this challenge and recruit more advocates that can champion the mission of Clery compliance.

This solution also has several potential advantages, according to the focus group:

- *It expands available resources.* By engaging the community surrounding an IHE, participants said, IHEs and professional associations can accelerate the cultural shift toward Clery compliance. More people are available to help and invest in the mission.
- *It lessens conflict between IHEs and surrounding neighbors.* Partnerships demonstrate that the IHE takes crime seriously, is forthright when it occurs, and recognizes that the effects extend beyond the IHE’s physical boundaries.

From the focus group:

“The culture shift is all about embracing transparency. That’s the real culture change that somewhere has to be reflected. I’m perplexed at how much of that is perceived and how much is real. If you have the culture, Clery is the best tool; if you don’t have the culture, it’s not.”

Participants noted that some members of these communities might resist the suggestion that they should be more involved in Clery compliance. Additionally, members of these communities may fear that their involvement may create liabilities for them. Ultimately, however, the participants determined that the following message reflects these ideas:

“Clery compliance isn’t done in a vacuum. IHEs should create and deploy communications plans that generate broad community involvement, and IHEs must take the lead in pursuing that community involvement.”

Sharing the Messages Effectively

Participants indicated that the messages IHEs send regarding Clery compliance must change hearts and minds, and that trust gives messages credibility. In turn, the focus group agreed that the most persuasive, and thus effective, messages come from people whom the recipients trust.

Participants also agreed that the one-on-one exchanges are more effective than group-to-group exchanges such as mass emails or widespread mailings.

Compelling messages contain verifiable data as well as emotion-based calls to action, according to the group. In addition, credible messages acknowledge the validities of other points of view on an issue.

The focus group determined that IHEs and professional associations should accordingly tailor their messages to different audiences — that is, their communications to marketing teams may be different than their communications to data teams.

From the focus group:

“Some people want to hear about how it impacts people or their feelings; others want data. So if you know what your audience is, you can target the message specifically for them to hear it in a way they understand.”

Professional associations and IHEs can also benefit by distributing written materials, best practices, talking points, and tip sheets regarding the importance of a cultural shift toward institutionalized Clery compliance. Focus group members felt that IHEs and professional associations aren't the only ones that can create those items; information from well-known, authoritative agencies and even corporate sponsors can also be persuasive or substantiate an argument.

Next Steps

The focus group discussed a variety of ways to leverage relationships to ensure that IHEs and professional associations actually create and send the message that Clery compliance is an institution-wide effort.

During the session, participants presented several ideas, including:

- Ask the Clery Center, the NCCPS, and the Education Advisory Board to develop and distribute materials that emphasize the importance of a culture of Clery compliance.
- Create multifunctional teams that present case studies at state or national conferences, as well as governing boards.
- Publish white papers on the topic with other groups and associations that have an interest in campus safety.
- Find corporate sponsors that have relevant audiences and partner with them for training.
- Distribute information to lawmakers on relevant topics for incorporation into legislative updates.
- Use conferences to build relationships among IHEs with credible people who can help IHEs push for cultural growth in Clery compliance.
- Write a statement of commitment that IHE presidents and chancellors could sign.
- Engage IHE foundations and their resources in order to help raise awareness and take action along with the IHE.
- Write articles for trade publications and scholarly journals.
- Host summits for nonrelated groups and even other IHEs to have informal discussions on the issue of Clery compliance.

- Distribute summaries of Clery violations and related fines within the IHEs.
- Circulate a letter of commitment to institutional Clery compliance signed by several IHEs and professional associations.

In February 2016, after the January focus group ended, the NCCPS wrote and distributed a survey to the participants, asking them what efforts they were willing to undertake in order to further the mission of creating a culture of Clery compliance. Ten of the 19 attendees responded, for a 53% acceptance rate. Seven were from IHEs and three were from professional associations. Among the findings:

- All IHEs responding to the survey said the following were somewhat or extremely important:
 - Receiving a case study on Clery compliance
 - Attending at least one presentation on Clery compliance at a professional conference in 2016
 - Creating and giving at least one presentation on Clery compliance before their IHEs' governing boards in 2016
 - Receiving materials, participating in research efforts, or receiving information from the Clery Center and/or the NCCPS in 2016
 - Professional associations the respondent belongs to meeting with lawmakers at any level on Clery compliance in 2016
 - Attending/viewing webinars and/or videos on Clery compliance for their IHE or other organization in 2016
- 29% of the IHE respondents said 2-5 people are directly involved on a full-time or part-time basis in Clery compliance in 2016; 14% said 6-10 people; 57% said more than 10 people.
- 14% of the IHE respondents said their IHEs plan to spend \$1,001 to \$10,000 on Clery compliance in 2016; 71% plan to spend between \$10,001 and \$50,000; and 14% plan to spend over \$100,000.
- Time is the biggest obstacle for IHEs when it comes to furthering efforts in Clery compliance (43%). Getting approval to spend money was the biggest obstacle for 14%; 14% also said both time and money were the biggest obstacles. For 29% of respondents, neither time nor money were the biggest obstacles.
- The professional associations that responded to the survey said the following were somewhat or extremely important:
 - Create and make at least one presentation on Clery compliance at a professional conference in 2016
 - Meet with lawmakers at any level on Clery compliance in 2016
 - Create webinars and/or videos on Clery compliance for members in 2016
- 100% of the professional association respondents said they plan to spend \$1 to \$1,000 on helping members institutionalize Clery compliance.

Recommendations and Conclusions

The focus group addressed three issues IHEs and professional associations face with regard to institutionalizing Clery compliance: identify what messages IHEs and professional associations should send about the topic, determine how those messages should be distributed, and decide how to execute on those determinations.

The messages are as follows:

- ✓ Compliance with the Clery Act demonstrates that a campus is listening to and caring for its students.
- ✓ Demonstrating knowledge about Clery compliance is one way high-performing faculty and staff members raise the value of our institution, increase our involvement in the campus community, and show the members of that community how much we value them and their safety.
- ✓ Developing and deploying Clery expertise reflects our commitment to the safety and security of our institution and adds value to all of our teams.
- ✓ Having a Clery committee is critical to a successful Clery program and a safer campus.
- ✓ Appointing dedicated employees to Clery compliance and programming creates expertise in leadership. IHEs should dedicate an appropriate percentage of certain positions to these tasks, commensurate with institution size, complexity, and budget.
- ✓ With the recognition that Clery compliance should not be fully automated, IHEs should use software to enhance and streamline the mechanics of Clery compliance.
- ✓ Written communications plans support Clery compliance, improve campus safety, and ensure that stakeholders get the right information.
- ✓ Clery compliance isn't done in a vacuum. IHEs should create and deploy communications plans that generate broad community involvement, and IHEs must take the lead in pursuing that community involvement.

The focus group found that in order for them to change the culture of compliance at an IHE, these messages should be sent:

- ✓ During one-on-one, in-person exchanges
- ✓ With accompanying verifiable data
- ✓ Alongside emotion-based calls to action
- ✓ With open acknowledgment of other points of view
- ✓ After tailoring the messages to the specific audience