

8-2019

## Effectiveness of Clery Act Timely Warnings and Emergency Notifications

Travis W. Douglas  
*Thomas Jefferson University*

Follow this and additional works at: [https://jdc.jefferson.edu/diss\\_masters](https://jdc.jefferson.edu/diss_masters)



Part of the [Emergency and Disaster Management Commons](#), and the [Higher Education Commons](#)

---

### Recommended Citation

Douglas, Travis W., "Effectiveness of Clery Act Timely Warnings and Emergency Notifications" (2019).  
*Theses & Dissertations*. 10.  
[https://jdc.jefferson.edu/diss\\_masters/10](https://jdc.jefferson.edu/diss_masters/10)

This Article is brought to you for free and open access by the Jefferson Digital Commons. The Jefferson Digital Commons is a service of Thomas Jefferson University's [Center for Teaching and Learning \(CTL\)](#). The Commons is a showcase for Jefferson books and journals, peer-reviewed scholarly publications, unique historical collections from the University archives, and teaching tools. The Jefferson Digital Commons allows researchers and interested readers anywhere in the world to learn about and keep up to date with Jefferson scholarship. This article has been accepted for inclusion in Theses & Dissertations by an authorized administrator of the Jefferson Digital Commons. For more information, please contact: [JeffersonDigitalCommons@jefferson.edu](mailto:JeffersonDigitalCommons@jefferson.edu).

EFFECTIVENESS OF CLERY ACT  
TIMELY WARNINGS AND EMERGENCY NOTIFICATIONS

A Dissertation

Presented to the Faculty

of Thomas Jefferson University

in Partial Fulfillment of the Requirements for the Degree of

Doctor of Management in Strategic Leadership

by

Travis W. Douglas

June 2019

## DISSERTATION APPROVAL FORM

Student Name: Travis W. Douglas

Semester/Year Graduation: June 2019

Name of Degree: Doctor of Management

Program: Strategic Leadership

### Student Agreement

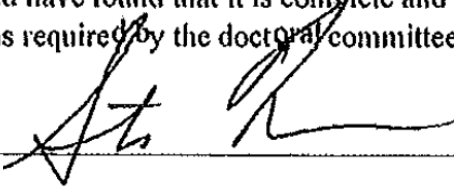
I certify that I have presented my doctoral committee with the final copy of my dissertation/capstone for examination and approval.

Signature of Student  Date: June 20, 2019

### Doctoral Dissertation Committee Agreement

I certify that I have examined the final copy of the above student's doctoral dissertation/capstone and have found that it is complete and satisfactory in all respects, and that any and all revisions required by the doctoral committee have been made.

Steven Freeman  
Committee Chair



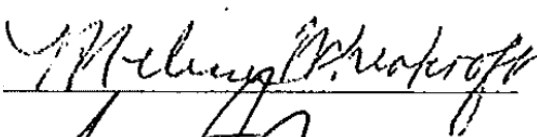
Date: 8/16/19

Tom Guggino  
Committee Member

Thomas A Guggino

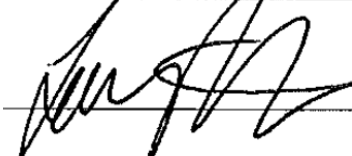
Date: 8/20/19

Melissa Wheatcroft  
Committee Member



Date: 8/20/19

Larry Starr  
Program Director



Date: 8/20/19

Shelly Osagie  
Dean

Shelley Osagie

Date: 9/11/19

Copyright © 2019 by Travis W. Douglas.

All rights reserved.

## ABSTRACT

The Clery Act (20 USC. § 1092(f)) is a federal law intended to improve campus safety by making information about crime as well as safety and security policies more accessible. Research has shown that the law's requirements to collect crime statistics and publish annual security reports have limited impact. Little research has examined the effectiveness of the timely warning and emergency notification provisions. This study explored the perceptions of Campus Security Authorities (CSAs) to determine whether timely warning and emergency notification messages are an effective tool for improving campus safety; to what degree they result in unintended harmful effects; and whether current training of CSAs is adequate to develop CSAs' knowledge and skills related to writing Clery Act message content. A 28-item questionnaire was distributed to a random sample of 5,000 individuals from a national list provided by the Clery Center. The completion rate was 10% ( $n=514$ ) and the margin of error was +/-5% at the 95% confidence level. The results indicate that CSAs perceive Clery Act messages to be effective at informing campus communities about crime, influencing safety-related behavior, prompting tips that solve crimes, and deterring crime. However, CSAs also indicated sizeable unintended harmful effects including that messages mislead people to believe that campuses are less safe than they actually are, provoke panic, reinforce racial stereotypes, are victim blaming, expose the identity of victims who report crime, trigger retaliation, re-traumatize victims of past crime, and cause chilling effects on crime reporting. Most CSAs (97%) receive training. However, only 44% reported receiving training that covered best practices for drafting messages that are trauma-informed regarding victims of sexual violence and only 33% reported receiving training that covered best practices for handling information about the race of suspects in crime reports.

*Keywords:* Clery Act, timely warnings, emergency notifications, campus crime, campus safety.

## PREFACE

In November 2016, Rowan University sent a timely warning message that drew me into one of the most challenging cases I have been involved in during my roughly 20-year career. The message said that a female student reported being sexually assaulted in the early hours of Sunday, November 13. It went on to say that she had engaged in a conversation with a male student she met in an elevator. She then went to his room, where she eventually fell asleep but was later awoken while being sexually assaulted. The university sent the message to comply with the requirements of the Clery Act, a federal law intended to improve campus safety, named for Jeanne Clery, who was raped and murdered in her residence hall room at Lehigh University in 1986. The Clery Act requires timely warning messages to be sent whenever there is a crime reported that represents an ongoing threat.

At the time, I worked at Rowan in the role of Assistant Vice President for Residential Learning and Inclusion Programs. In that position, I supervised the directors of the university's housing department and our campus social justice and inclusion centers, including our Multicultural Center and Women's Center; served as a Deputy Title IX Coordinator; and served on our campus Clery Act committee. These responsibilities meant that I was a "Campus Security Authority" under the Clery Act.

Over the next several days I was involved in the efforts to follow-up on the report including coordinating with police detectives who were investigating the crime, attempts to reach out to and provide services to the victim, as well as addressing the concerns of members of the campus community. I was very troubled by the information I learned about the crime, but I was also troubled, and surprised, by the impact the message had on many people across our campus community.

Because my position involved an intersection of responsibilities in many areas, I had relationships with people with different roles and perspectives. I heard from police who explained their decision making in sending the message and the pertinent information that was available to them when they wrote the message. I also spoke to members of our housing staff who said they felt the message blamed the victim for placing herself in the situation. They also said they felt the message did not hold the perpetrator responsible for his actions. Eventually, I also heard from counselors and psychologists from our Wellness Center, who said the message had triggered intense feelings among students who had a history of past sexual trauma.

I recalled that years earlier, another timely warning message had led to similar controversy. A student had reported being raped near a campus residence hall. She provided a fairly vague suspect description, except that her attacker had been a Black male. A timely warning message was sent to warn the campus community of the incident and it included that racial description. Because it could apply to almost any Black male student, it made many Black male students feel uneasy. It seemed to reinforce a stereotype of all Black men as criminal suspects. When it was later revealed that the report was falsified, meaning the rape never happened, it was clear the message had actually caused much more harm than good.

Throughout my career, I have worked in positions at many different institutions in which I was classified as a “Campus Security Authority” under the Clery Act. Due to these responsibilities, I have completed a multi-day training through a reputable national organization and annual refresher trainings regarding the reporting requirements of the act. None of the training programs I completed prepared me for these conversations or gave me a



clear understanding of what was supposed to be included in a Clery Act timely warning message and what, if anything, should not be included.

I found myself puzzled and concerned by the impact that timely warning messages seemed to have on our community. Why was a law intended to improve campus safety leading to messages that people perceived as victim blaming? Why send messages that resurface memories of traumatic events among victims of past crime? Why include information that might reinforce racial stereotypes? Do these messages serve a useful purpose? Could they be written in a way that would avoid these unintended harmful effects?

At the same time, I was enrolled in graduate study at Thomas Jefferson University, pursuing a Doctor of Management in Strategic Leadership (DSL). The DSL curriculum encouraged students to see complex problems through the lens of holism and to apply systems thinking as a methodology for solving complex problems. The apparent problems associated with Clery Act timely warning messages seemed to emerge from the complexity of issues surrounding campus crime, the experiences of victims, and systemic issues associated with beliefs about rape and race in our broader culture. Through a literature review done as a class assignment, I found very little research regarding these messages and their effectiveness. This led me to believe that Clery Act timely warning and emergency notifications and their effects could benefit from further study and that this would be a suitable topic for this dissertation.

I am especially grateful to the Clery Center for its support in completing this research by providing access to its national contact list, and to the Arlen Specter Center for Public Service at Thomas Jefferson University and the Specter family for their support through sponsorship of the 2018 Arlen Specter Center for Public Policy Research Fellowship. I am

also grateful for the assistance of colleagues at Rowan University and my peers in the Jefferson DSL program who supported me and served as sounding boards throughout my process of conducting this research. Thanks also to the respondents who contributed their time to provide the data needed for this study. Finally, thank you to my dissertation committee members, Steve Freeman (chair), Tom Guggino, and Melissa Wheatcroft for their support, feedback, and assistance with completing this dissertation.

It is my hope that this research will contribute to the field and its understanding of the Clery Act as a tool for promoting campus safety, and that it will prompt efforts to enhance training and practices related to timely warning and emergency notification messages.

## TABLE OF CONTENTS

ABSTRACT .....	iii
PREFACE .....	v
TABLE OF CONTENTS.....	ix
LIST OF FIGURES .....	xii
LIST OF TABLES .....	xiv
CHAPTER 1: INTRODUCTION .....	1
Problem Statement.....	6
Statement of Purpose.....	9
Significance.....	9
CHAPTER 2: LITERATURE REVIEW.....	10
Origin and Purpose of the Clery Act .....	10
Campus Crime Data.....	11
Perception of Crime on Campus.....	13
Consumer Protection Law.....	16
Enforcement and Court Cases.....	17
Evidence of Problems.....	21
Chapter Summary.....	22
CHAPTER 3: METHODS .....	24
Research Questions & Hypotheses.....	24
Population and Sampling Frame.....	25
Participants.....	28
Instrumentation.....	29
Pilot Testing.....	32
Institutional Review Board.....	34
Distribution and Data Collection.....	35
Participant Consent.....	36
Data Analysis.....	37
Limitations.....	37

CHAPTER 4: RESULTS AND RESPONDENT CHARACTERISTICS.....	41
Respondent Characteristics.....	43
Chapter Summary.....	48
CHAPTER 5: CLERY ACT MESSAGES IN PRACTICE.....	49
Distribution Methods.....	50
Reasons for Sending Messages.....	52
Message Content Contributors.....	54
Effectiveness as a Tool to Promote Campus Safety.....	56
Informing about Safety Issues.....	57
Influence on Safety-related Behavior.....	58
Solving crimes.....	59
Deterring crimes.....	61
Failing to Warn - Hiding Crime.....	61
Assessment.....	63
Overall, how effective are Clery Act Messages help solve crimes?.....	65
Chapter Summary.....	66
CHAPTER 6: UNINTENDED HARMFUL EFFECTS.....	67
Misleading and provoking fear.....	69
Reinforcing racial stereotypes.....	72
Impacting victims of crime.....	76
Deterring prospective students from enrolling.....	86
Chilling effects on crime reporting.....	88
Chapter Summary.....	90
CHAPTER 7: TRAINING.....	91
Chapter Summary.....	97
CHAPTER 8: CONCLUSION AND IMPLICATIONS.....	98
Implications for practice.....	102
Shifting attention from statistics to messages.....	102
Improving guidance.....	102
Improving Training.....	103
Improving message content.....	103

REFERENCES .....	104
APPENDIX 1: QUESTIONNAIRE.....	112
APPENDIX 2: DISTRIBUTION EMAILS.....	130
APPENDIX 3: IRB DOCUMENTATION .....	134
APPENDIX 4: FUNCTIONAL WORK AREA OVERLAP.....	136

## LIST OF FIGURES

Figure 1.1. Ohio State University Emergency Notification.....	5
Figure 1.2. University of Minnesota, Twin Cities Racial Stereotyping Flyer.....	8
Figure 2.1. Reported criminal offenses.....	12
Figure 2.2. Reported VAWA offences.....	13
Figure 2.3. Reported hate crimes.....	13
Figure 3.1. Institution sector comparison to national data .....	39
Figure 3.2. Institution type comparison to national data .....	39
Figure 3.3. Institution enrollment size comparison to national data .....	39
Figure 4.1. Respondents’ functional area.....	43
Figure 4.2. Respondent’s Clery Act compliance responsibilities.....	45
Figure 4.3. Respondents’ Institution sector.....	46
Figure 4.4. Respondents’ institution type.....	46
Figure 4.5. Respondents’ institution enrollment.....	47
Figure 4.6. Institutions’ primary campus location.....	47
Figure 5.1. Reasons for timely warning messages.....	52
Figure 5.2. Reasons for emergency notifications.....	53
Figure 5.3. Contributors to developing message content.....	55
Figure 5.4. Do Clery Act messages help to inform people about safety issues?.....	57
Figure 5.6. Short-term vs. long-term behavior changes.....	58
Figure 5.7. Have messages assisted in solving crime?.....	59
Figure 5.8. Have Clery act timely warning messages prevented or deterred crime?.....	61

Figure 5.9 Are Clery Act messages ever not issues when they should be?.....	63
Figure 5.10 Institutional assessment of perceptions of messages.....	63
Figure 6.1. Reported problems with Clery Act messages .....	68
Figure 6.2. Rowan University timely warning message. ....	75
Figure 7.1. Have respondents received training? .....	92
Figure 7.2. Format of training completed by respondents .....	94
Figure 7.3. Content of training completed by respondents .....	94
Figure 8.1. Clery Act message system diagram.....	101

## LIST OF TABLES

Table 3.1 Research Questions and Hypotheses.....	24
Table 3.2 Mapping questionnaire items to research questions, hypotheses and study variables.....	30
Table 5.1. Chapter 5 Research Questions and Hypothesis .....	49
Table 5.2. Effectiveness of message distribution methods.....	51
Table 5.3 Do CSA’s believe Clery Act messages help to inform people about safety issues?.....	57
Table 5.4 Short-term behavior change.....	60
Table 5.5 Long-term behavior change.....	64
Table 5.4 Have messages assisted in solving crime? .....	58
Table 5.5 Assessment of perceptions of Clery Act messages.....	64
Table 5.6 Overall opinion of timely warning messages as a tool for improving campus safety.....	65
Table 6.1 Chapter 6 Research Question and Hypothesis.....	67
Table 6.2 Misleading people about campus safety.....	71
Table 6.3 Provoking fear.....	72
Table 6.4 Reinforcement of racial stereotypes.....	74
Table 6.5 Exposing the identity of victims who report crime.....	79
Table 6.6 Causing victims of past crime to experience trauma.....	80
Table 6.7 Messages that are perceived as victim blaming.....	83
Table 6.8 Retaliation against those who report crime.....	84
Table 6.9 Deterring prospective students from enrolling.....	87



Table 6.10 Chilling effects on crime reporting .....	87
Table 7.1 Chapter 7 Research Question and Hypothesis .....	91
Table 7.2 Respondents participation in formal Clery Act training.....	93

## CHAPTER 1: INTRODUCTION

*What would you do if you knew you were heading towards danger?... If you were about to be robbed, assaulted, raped, or even murdered? Almost certainly, you would take action to prevent that crime from happening.*

That was the sort of question that Connie and Howard Clery considered in proposing legislation to make information about campus crimes accessible to students, parents and the public following the tragic death of their daughter. In April of 1986, their daughter, Jeanne Clery, was raped and murdered in her residence hall room at Lehigh University. The killer was another student who had been drinking and entered the building through a series of propped open doors that compromised the building's security (Zdziarski, Dunkel, & Rollo, 2007).

During the investigation and trial, as well as a subsequent civil lawsuit, the Clerys learned a great deal about security on the Lehigh campus and about crimes that occurred there prior to their daughter's enrollment. They were vocal about the fact that they had never been made aware of those crimes. They believed that had they been aware, they would have made a different choice about where to enroll Jeanne (Gross and Fine, 1990).

This tragedy prompted the Clery family to begin their work advocating for safer campuses and public release of information about campus crimes (Zdziarski II, E. L., 2007). Howard Clery said, "When your daughter is slaughtered, you have two choices - curl up and let the world go by or fight back" (as quoted by Nelson, 2008). Using funds from the settlement of a civil lawsuit, the Clerys founded Security on Campus, Inc., which later became the Clery Center.

In 1988, they were successful in securing passage of the College and University Security Act in Pennsylvania (24 P. S. §§ 2502-1—2502-5). In 1990, they also achieved success at the federal level with the passage of the Student Right to Know and Campus Security Act (Public Law 101-542), which was renamed the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act in 1998 (Public Law 105-244) (hereafter referred to as the Clery Act). The intent of the law was to improve campus safety by making information about crime as well as campus safety and security policies more accessible to students, parents, employees, and others.

The Clery Act, along with the implementing regulations currently in effect (34 CFR part 668; U.S. Department of Education, 2016), have several requirements with which institutions receiving federal funding must comply. These can be summarized briefly as follows:

1. Collection of statistics regarding specified crimes occurring in covered geographic areas associated with each campus, as well as fire statistics from campus residence halls.
2. Maintenance of a publicly available crime log and fire log.
3. Publication of an Annual Security Report disclosing crime and fire statistics as well as certain safety and security policies.
4. Distribution of timely warnings about specified crimes reported in covered geographic areas associated with each campus when the institution considers them to represent a continuing or ongoing threat to students or employees.

5. Distribution of emergency notifications during significant emergencies or dangerous situations that pose an immediate threat to the health or safety of students or employees.

Research on the effectiveness of the Clery Act has focused primarily on the collection and public availability of crime statistics. This is logical given that the Clerys' underlying premise in promoting the legislation was that the availability of this information might help to shape the decisions of students and parents.

Unfortunately, the research reveals that the law has not achieved that intended outcome. Prospective students rarely read the crime statistics and they do not impact most students' choice of institution. In a survey of parents, only 22% recalled receiving these statistics and only 15% read them (Janosik, 2004, 45). Only 4% of conduct administrators reported seeing evidence that the crime statistics impacted students' choice of institution (Janosik & Gregory, 2003, pg. 771). When surveyed, only 8% of undergraduate students indicated that the crime statistics were influential to them (Janosik & Gehring, 2003).

In addition to questionable efficacy, administration of the law has become burdensome and costly to institutions. In a study of conduct administrators, 30% indicated that their caseloads had increased since the passage of the law (Gregory & Janosik, 2003, pg. 766). However, conduct administrators did not perceive that the law had reduced crime on campus, with only 2% reporting that it had, while 50% reported it was ineffective or very ineffective (Janosik & Gregory, 2003, pg. 771). In a survey of campus law enforcement, respondents reported very little impact on student behaviors related to their security on campus (Janosik, & Gregory, 2003, pg. 193), and only 10% felt that changes in crime rates could be attributed to the effects of the law (Janosik, & Gregory, 2003, pg. 192).

While the crime statistics do not seem to have the intended beneficial effect, the emergency notification and timely warning provisions of the law seem to have a more practical use. Two of the most active researchers on Clery Act effects, Dennis Gregory and Steven Janosik have argued persuasively that:

“The emphasis on the campus crime reports should be lessened and a focus upon increasing campus safety programs, notification to students about safety hazards, increased “timely notice” when a serious crime occurs, and increased cooperation between campus officials, students, the media, and others to change student behaviors must be the new focus (Gregory & Janosik, 2003).”

Instances when campuses have issued emergency notifications and timely warnings have significantly shaped how campus communities responded to protect themselves. For example, in 2016, Ohio State University issued an emergency notification when a person pulled a fire alarm, then drove a car into a crowd as people evacuated, exited his vehicle and started stabbing people with a machete (Associated Press, 2016); (Hartley-Parkinson, 2016).

In a series of tweets, the campus office of emergency management alerted the campus to the danger. In the early confusion, the incident was believed to be an active shooter (involving a gun):



*Figure 1.1.* Ohio State University Emergency Notification

People on campus quickly saw these messages and took steps to avoid the danger, perhaps saving themselves from being injured or killed. This example is one of many that illustrates the potential of the emergency notification and timely warning provision of the Clery Act to be useful and more effective than crime statistics at directly impacting campus safety.

However, to date, there has been little formal research on this provision of the law. Research on the implementation of this provision has the potential to improve the practices of campuses implementing these warnings, and also to help shape the debate about the Clery Act in general in order to shift the focus of regulators towards investing in what works, rather than what is now known to be ineffective.

## Problem Statement

The Handbook for Campus Safety and Security Reporting (U.S. Department of Education, 2016) provides guidance to campus administrators about all aspects of compliance with the Clery Act. There is very minimal guidance regarding the content that should be included in emergency notification or timely warning messages. Below is the entire passage on required timely warning content (pgs. 6-14-6 – 6-15):

The Department's Clery Act regulations do not specify what information has to be included in a timely warning. However, because the intent of the warning is to enable members of the campus community to protect themselves, the warning should include all information that would promote safety and that would aid in the prevention of similar crimes. Issuing a warning that cautions the campus community to be careful or to avoid certain practices or places is not sufficient. You must include pertinent information about the crime that triggered the warning. Your institution's policy regarding timely warnings should specify what types of information will be included.

This lack of guidance has left institutions essentially on their own to determine what "*pertinent information*" to include and how to craft a message that will "*promote safety*" and "*aid in prevention of similar crimes.*" In some cases, institutions have been accused of mistakes, and indeed, causing unintended harms in the process.

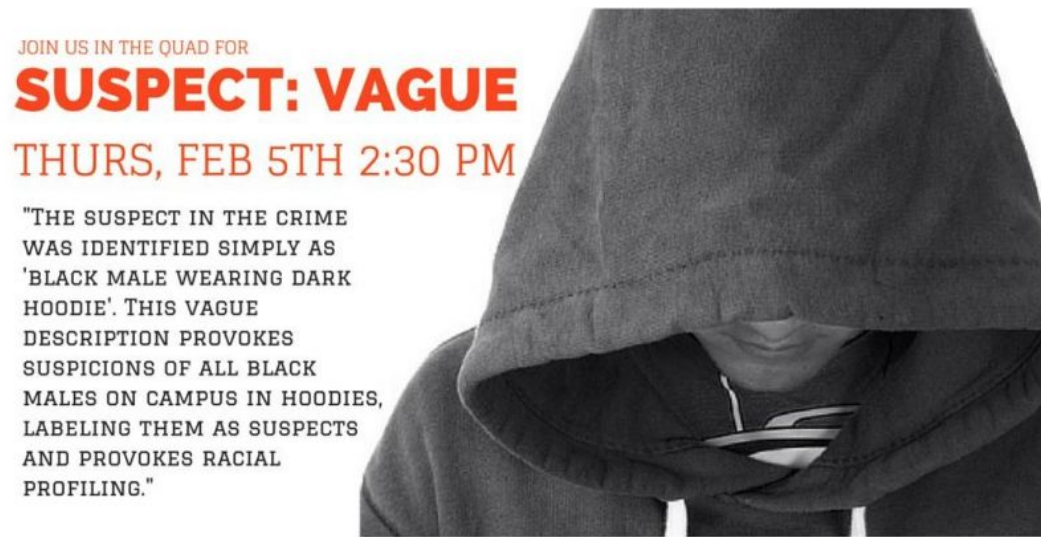
The perception of what is timely is one source of controversy. At Duke University, Sean Gilbert reported a robbery. The University issued a timely warning some 50 minutes later. In a Facebook post (Moorthy, 2016), Gilbert later commented, "It took DUPD 50 whole minutes to notify campus a man outside our community had held up someone just feet from a residential community and was still somewhere on the loose. Meanwhile, people are walking between apartments and walking alone through the gardens completely unaware of the security threat—when DUPD had the choice to notify us...What good is a campus alert 50 minutes after the fact?"

Victim blaming, exposing the identity of victims who report crime, and retaliation are also significant concerns associated with Clery Act messages. In an interview by the Daily Collegian at Penn State (Greiss, 2016), Erin Farley said, “To some people, especially survivors of sexual assaults, the details on the timely warnings can be triggering, upsetting or frustrating,”... “Some people are assaulted in a certain place and if the timely warning reports that place, they may be fearful that the perpetrator may know they reported it.” Police detective Keith Rob also indicated that disclosures can cause harm. Rob said, “I know in the past when fraternities were identified as a location for the sexual assault, the victim was harassed by her friends, by the fraternity, friends of the fraternity — and it cost us.”

At a number of universities, including Louisiana State and Yale, the issue of racial profiling by campus law enforcement has also been raised in connection with timely warnings (Jaschik, 2015). At the University of Minnesota – Twin Cities, students protested the inclusion of race in suspect descriptions included in timely warnings. The concerns stem from the potential for descriptions that reference race to wrongly stereotype people of color.

The Minnesota Daily published an op-ed that “cited a crime report that stated that suspects in a crime were black males between the heights of 5 feet 5 inches and 6 feet 2 inches. ‘This height range alone covers most adult men in the United States. As of 2014, there are approximately 2,400 black students on the Twin Cities campus. If this report were to be acted upon, more than a thousand black male students, faculty and staff could become potential suspects’ (as quoted in Jaschik, 2015).” Their protest effort was promoted using a poster that called attention to the vague nature of suspect descriptions:





*Figure 1.2.* University of Minnesota, Twin Cities Racial Stereotyping Flyer

The students' protest efforts led to significant campus debate and a decision by the President to change institutional policy. In announcing the change, University of Minnesota – Twin Cities president Eric Kaler said "We have heard from many in our community that the use of race in suspect descriptions in our crime alerts may unintentionally reinforce racist stereotypes of black men, and other people of color, as criminals and threats. That, in turn, can create an oppressive climate for some members of our community, a climate of suspicion and hostility (Jaschik, 2015)." Similar policy changes have been made at other institutions including Virginia Commonwealth University (Byers, 2017) and the University of Wisconsin, Madison (Richards, 2017). It is a difficult decision because failure to include all pertinent information known to the institution, including the race of suspects, may expose the institution to the accusation that timely warning messages are unclear.

**Statement of Purpose**

The intent of this study was to understand the effects of the emergency notification and timely warning provisions of the Clery Act. The study explores the intended beneficial effects — improving campus safety by providing information to students, faculty and staff — but also the extent of unintended harmful effects such as victim blaming, exposing the identity of victims who report crime, triggering retaliation, re-traumatizing victims of past crime, reinforcing racial stereotypes and causing chilling effects on crime reporting.

**Significance**

Understanding the effectiveness of Clery Act messages will help to shape how campus administrators implement these provisions and improve their practice, with the aim of eliminating or mitigating unintended harmful affects. In addition, research providing this insight may help to shape how regulators in the Department of Education develop policy and future iterations of the Handbook for Campus Safety and Security Reporting.

## CHAPTER 2: LITERATURE REVIEW

### Origin and Purpose of the Clery Act

The passage of the Student Right to Know and Campus Security Act (Public Law 101-542) in 1990 was a response to broad concern about crime and the safety of America's college and university campuses as well as a perception that colleges and universities did not make data about crime available. At the time of its passage, only 4% of colleges and universities (350 schools) voluntarily reported crime statistics to the FBI for inclusion in the Uniform Crime Reports (Jouzaitis, 1990). Crime victims and their families often complained about schools' failure or refusal to release information about campus crime (Griffaton, 1993). At a conference at the University of Pennsylvania in 1988, Howard Clery said that schools were hiding behind a "curtain of silence and hypocrisy. Universities do not hold themselves responsible for crime on campus. Many won't release crime statistics to people who have a right to know. (as quoted by Solomon, 1988)."

During debate in the U.S. House of Representatives, Representative Williams of Montana noted that "Articles about increases in crime and racial violence on college campuses have, of course, raised concerns about the safety of students on college campuses. For parents and students, the decision on which college or university to attend has become far more complicated than simply selecting an institution based on academic standards (Congressional Record H.R. 1454 June 5. 1990)." Representative William Goodling of Pennsylvania, home of the Clerys, remarked "Mr. Speaker, over a year and a half ago, I was contacted by Howard and Connie Clery, whose daughter was brutally murdered at a university. Before my conversation with them, I did not generally associate the words "crime" and "campus." I viewed college and university campuses as quiet, idyllic places far

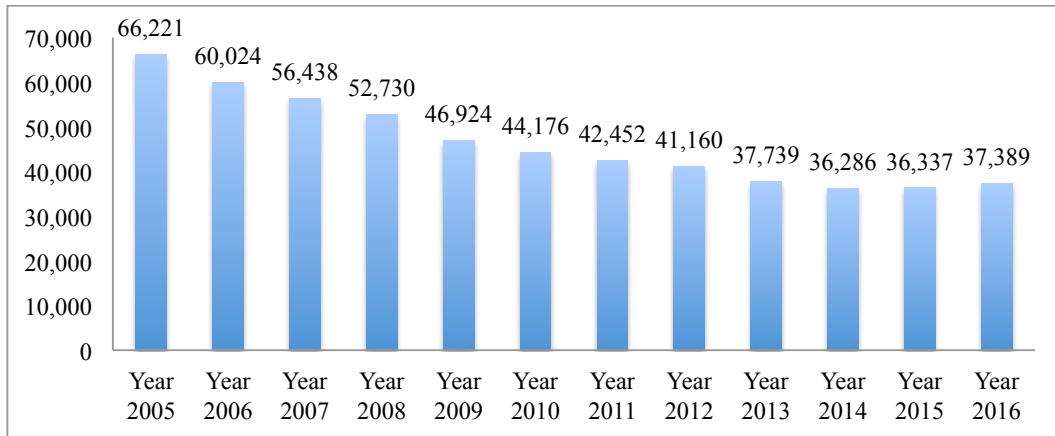
removed from many of the horrors facing the rest of society. But this is a false image (Congressional Record H.R. 1454 June 5. 1990).”

### **Campus Crime Data**

Campus crime has been a significant concern on American college and university campuses for a long time. Student riots were noted at Harvard, Yale, and Princeton as early as the beginning of the 1800s. In the years preceding passage of the Student Right to Know and Campus Security Act, several high profile violent crimes occurred. These included the 1986 rape and murder of Jeanne Clery at Lehigh University and the 1987 killing of Katherine Hawelka at Clarkson University. While high profile incidents such as these would gain media attention, overall statistics about campus crime were generally unavailable because campuses policed themselves and disciplined their own students rather than referring students to the criminal justice system (Griffaton, 1993).

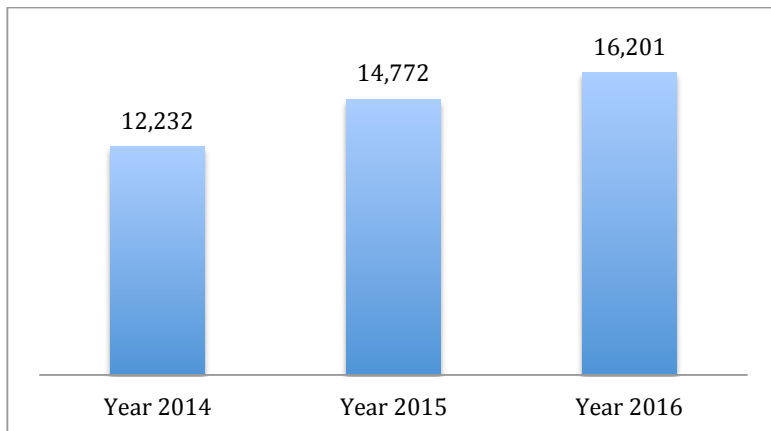
Volkwein et al., (1995) examined data regarding campus crime trends. Their findings showed that the rate of violent crimes (including assault, robbery, murder, and rape) was escalating nationally while decreasing on campuses between 1974 and 1992. Also noteworthy was the finding that rates on campus were significantly lower per capita when compared to the national crime rate. Volkwein et al., also noted that there was no significant relationship between off-campus and on-campus crime rates. Their conclusion was that campuses are much safer than the communities where they are located and the majority of crimes that did occur on campus were not violent, but property related (burglary, motor vehicle theft).

Recent data available because of the reporting requirements of the Clery Act shows a more complex picture of crime on campuses. The overall crime rate between 2005 and 2016 has been in decline, dropping from 66,221 crimes reported in 2005 to 37,389 (U.S. Department of Education, 2018).

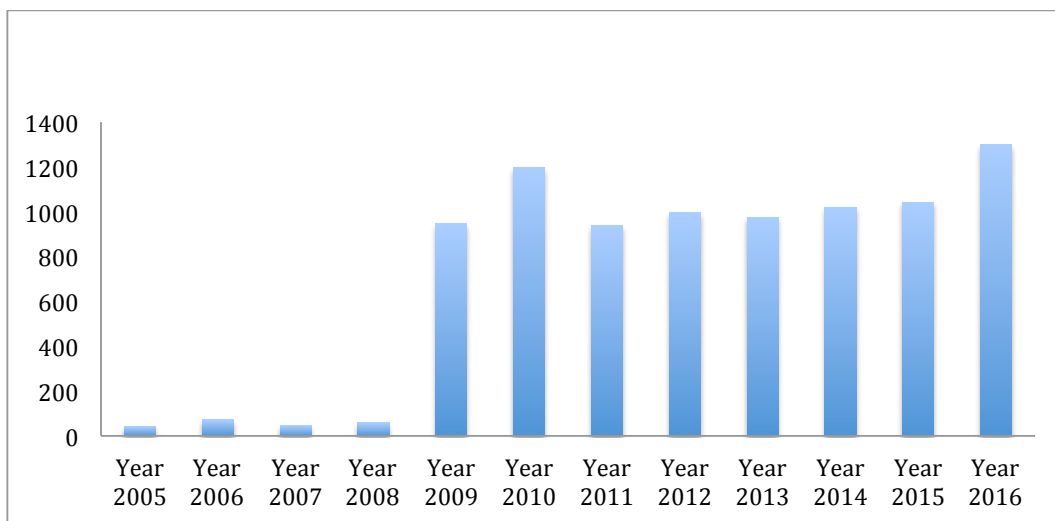


*Figure 2.1.* Reported criminal offenses. Adapted from U.S. Department of Education, Office of Postsecondary Education, Campus Safety and Security (CSS) survey.

However, offenses defined under the Violence Against Women Act (rape, fondling, stalking, incest), often referred to as VAWA, which amended the Clery Act, and hate crimes (motivated by the perpetrator's bias against the victim due to their race, ethnicity, national origin, gender, sexual orientation, religion or disability) have been increasing:



*Figure 2.2.* Reported VAWA offences. Adapted from SOURCE: U.S. Department of Education, Office of Postsecondary Education, Campus Safety and Security (CSS) survey.



*Figure 2.3.* Reported hate crimes. Adapted from U.S. Department of Education, Office of Postsecondary Education, Campus Safety and Security (CSS) survey.

### **Perception of Crime on Campus**

While the available data about campus crimes indicates that students are not at any greater risk than the general population - in fact, the opposite appears true – there is a sense of fear about campus crime among the general population. Matthews (1993) wrote about the

perception that American college campuses had transformed in the 1980s from tranquil enclaves into armed camps - noting ax attacks in libraries, hostage taking, shootings, and murder – and asserting that 1 in 3 students would be the victim of some sort of crime and that estimates of women being raped ranged between 1 in 7 and 1 in 25. Matthews framed the context as one of open residence hall doors, carelessness and naiveté that made college students easy targets for crime, while institutions focused on producing glossy brochures rather than complying with the provisions of the Clery Act.

Media coverage of campus crime has created a perception that campus crime is usually violent, while the reality has been that violent crime is rare and theft and property crime constitute the majority of campus crime (Fisher, 1995). Upon passage of the Clery Act, higher education professionals worried that the Clery Act would not improve the public's understanding of campus crime issues because data would be taken out of context. Darryl Greer, executive director of the New Jersey State College Governing Boards Association, was quoted as saying “My concern is that people will use this information to sensationalize or stereotype institutions. To use this information alone to compare different types of institutions may be misleading and dangerous (Burd, 1992).”

Heath (1984) examined fear associated with news coverage of crime and found that coverage increased fear among the general population as well as college students. The increase in fear was strongly tied to whether the crime was perceived to be random and whether it was near or far from the reader. Kaminski et al. (2010) examined the fear of being attacked by a weapon and the impact of the Virginia Tech and Northern Illinois campus shootings using surveys administered prior to and following those incidents. They referenced that in 1990, the year with the highest number of campus shootings prior to their study, the

likelihood of being shot was .000002% (38 shootings among 17,487,475 students enrolled nationwide). While this represents a very small chance of actual victimization, their study also showed that media coverage of these incidents, particularly the Virginia Tech incident, increased student fear of being attacked by a weapon by about 9% among students at the University of South Carolina.

Baum (2017) examined the role that social networking services (SNS) play in informing students about crime. In a quantitative study, Baum found that 93.09% of students used SNS and that 39.1% used SNS to read about crime that occurred at their own institution, Stockton University. Also, 74.11% used SNS to read about crime at other institutions. In follow up qualitative interviews, Baum found results similar to Heath (1984). Subjects commented that when reading about crime via SNS it increased their fear of crime and that closer events were more significant:

Pat- "I feel more inclined to talk about campus safety when it becomes a pressing issue like *when there was the bias crime back in November it was more something I thought of and I kind of felt less comfortable about it* so I wanted to talk about it more because I felt like it needed to be addressed if it was happening. And with schools like shootings [sic], *especially if it was like close by*, I would probably be more inclined to talk about how maybe there is something we need to do in order prevent it (Baum 2017, pg. 148)."

Nate- "For instance the other day, I am in a fraternity here and the other day *someone posted in our page* and was like *the headline was like someone drives car through fraternity house and shoots up fraternity house* so when I saw that I had never thought about that before it had never crossed my mind before and that was an online social media reference article, and now I know the next time I am with brothers or even if we are just getting lunch in the campus center *I am going to be a little on edge just because I have heard that and it's the back of my head now...* (Baum 2017, pg. 149)"



### **Consumer Protection Law**

Historically (prior to the Clery Act and a handful of state laws), the principle of *caveat emptor* (buyer beware) was the principal rule that governed the relationship between students and schools with respect to the school's safety (and suitability generally). Schools had no legal duty to track or to disclose crime-related information to students, parents or the public, and most did not. The common law provided a potential avenue for relief, through tort actions. The common law recognized the potential for tort claims in certain circumstances (Schwartz and Silverman, 2005). These include fraudulent or negligent misrepresentation, concealment and nondisclosure. Eventually, Congress recognized the inadequacy of the common law as a protection for the interests of the public, which led to the creation of the Federal Trade Commission (FTC) and the development of statutory consumer protection laws such as the Wheeler-Lea Act of 1938 (Public Law 75-447).

The adoption of the Student Right to Know and Campus Security Act (Public Law 101-542) established a duty to disclose crime data and provide warnings to students and their parents. During debate about the adoption of the Student Right to Know and Campus Security Act (Public Law 101-542), Representative William Goodling of Pennsylvania described the act as a consumer rights bill (101 Cong. Rec. 1259, 1990):

Mr. GOODLING. Mr. Speaker, the bill we have before us today, H.R. 1454, the Student Right to Know and Campus Security Act, is a consumer rights bill for students. It requires schools to provide students with information which will assist them in making decisions concerning college attendance – and it provides students with information they need to protect themselves against becoming crime victims.

The adoption of the law changed the relationship between schools and students from that of *caveat emptor* to one protected by a defined legal duty to disclose and to warn that would be subject to federal enforcement authority.

## **Enforcement and Court Cases**

In the early years after passage of the act, compliance was notably low and little emphasis was paid to enforcement efforts. In 1998 an amendment was passed (105<sup>th</sup> Cong. Rec. S7784, 1998) renaming the act the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act in 1998 (Public Law 105-244) and authorizing the Department of Education to impose civil fines on institutions that failed to comply. However, concern about compliance continued for several years. In remarks in the U.S. Senate, Senator Arlen Specter, the original sponsor of the legislation in the Senate, stated that:

“Regrettably, there is only about one- third compliance with the schools on that act. The beginning of the school year is the time they call the Red Zone when there are more offenses likely to be committed. For this reason, Security on Campus has designated September 2006 as National Campus Safety Awareness Month to provide an opportunity for colleges and universities to inform students about existing campus crime trends. At a very minimum, the colleges and universities ought to comply with the law on disclosure so that students may know what the risks are (109 Cong. Rec. S37, 2006).”

More recently, a number of high profile cases have led to greater emphasis on federal investigations and enforcement, including increasingly higher fines for violations of the act.

One of the most significant examples was the mass shooting that occurred at Virginia Tech in April, 2007. A student entered West Ambler Johnston Hall and shot two people using semi-automatic pistols. The police began to investigate and believed he had fled the area, therefor posing no ongoing threat. No timely warning was issued at that time. However, the the shooter made his way to Norris Hall where he shot and killed 30 and wounded 17 others.

Following a Department of Education investigation of the institution’s Clery Act compliance, the Department of Education imposed a \$25,500 fine for failure to issue the

timely warning and an additional \$5,500 fine for misstating its policy in the institution's Annual Security Report (DeSantis, 2014). Had a timely warning been issued – *in a timely manner*- perhaps some of those deaths could have been prevented.

In 2016, the Department of Education imposed what is to date the largest ever fine for violations of the Clery Act (U.S. Department of Education, 2016), \$2,397,500. The department cited The Pennsylvania State University (Penn State) for 11 serious violations of the Clery Act related to the handling of sexual abuse of boys by Jerry Sandusky, including failure to issue timely warnings when Sandusky's crimes were reported.

Sandusky was Defensive Coordinator with the Penn State football team and he also created a charity youth sports program known as The Second Mile. Sandusky used his access to young players through these programs to groom and molest them. Multiple reports of misconduct by Sandusky were made to university officials. Those reports were either disbelieved and ignored or dismissed to protect the reputation of the institution and the lucrative football program. Sandusky was ultimately convicted of 42 counts of sex crimes against children.

The Board of Trustees commissioned an investigation led by former Director of the Federal Bureau of Investigations, Louis Freeh and his law firm. Freeh's report (Freeh, Sporkin, & Sullivan, 2012) found a "total and consistent disregard for the safety and welfare of Sandusky's child victims." Due to the institutional neglect, the university's President and several other senior administrators were removed and also charged with criminal offenses for their involvement.

The most recent large fine was imposed on the University of Montana in 2018 (Malafronte, 2018; Szpaller, 2018). The Department of Education investigated a campus

crime program assessment and found that the university had published inaccurate crime statistics from 2009-2011. Due to those errors and media reports that the university mishandled sexual assault and harassments cases, the department expanded its investigation to cover the years form 2012-2015, finding additional errors in the university's crime statistics. The fine totaled \$996,614 for all of the violations taken together.

An analysis of court cases involving the Clery Act by Richardson (2014) examined case law emerging from state as well as federal courts. Findings of note include the following:

1. **Defamation:** In *Havlik v. Johnson and Wales University*, 509 F.3d 25 (1st Cir. 2007), the court found that a timely warning issued by the university that named a suspect could not be grounds for a defamation claim because the institution issued it in compliance with the Clery Act and acted "in good faith with a reasonable belief that there exists a legal, moral, or social duty to disclose information or that disclosure is necessary to protect self or others."
2. **No Private Right of Action:** In *Lewen v. Edinboro University of Pennsylvania*, 2011 WL 4527348 (W.D. Pa. Sept. 28, 2011), the court dismissed a lawsuit against the university on the grounds that the Clery Act did not create a private right of action. The case was filed by a student who brought a gun to campus and sought advice on how to store it. Police visited her and took possession of the gun for safekeeping. She was not arrested for any crime but was later asked to voluntarily withdraw because bringing the gun to campus was a crime. The student later sued and argued that the university had a duty to arrest and prosecute her and report the crime in its Clery statistics.

3. In *Doe v. University of the South*, 687 F. Supp. 2d 744 (E.D. Tenn. 2009), the court issued a declaratory judgment that the due process rights of a student were not violated by the university. The student, John Doe, was accused of sexual assault. Doe alleged that the university violated his due process rights when it found him responsible for a sexual assault that occurred in 2009 using procedures that did not comply with the requirements of the Clery Act. However, the court found that the regulatory oversight of the Department of Education, with the potential for civil fines, was the more appropriate venue for addressing the Clery Act violations.
4. **Negligence:** In *James v. Duquesne University*, 936 F. Supp. 2d 618 (W.D. Pa. 2013), a student who was shot on campus following a campus event argued that the university owed a duty to provide reasonable security on campus because of previous incidents of violence as evidenced in the crime reports. The court found that the institution's crime statistics did not create a higher duty to provide security and dismissed the complaint.

In *Kleisch v. Cleveland State University*, No. 50AP-289, 2006 WL 701047 (Ohio Ct. App. 83 2006), the court dismissed the claim of a student raped in a classroom who argued the university had a contractual duty to protect her and that Clery Act crime data was underreporting the amount of actual crime occurring, which gave her a false sense of safety. The court examined the institution's Clery Act data and found one rape occurring one year and four months previously that occurred in the restroom of a different building. It ruled that the university had not breached its duty to protect her because her rape was not foreseeable.

## **Evidence of Problems**

Very little scholarly research has been conducted on the effects or implications of Clery Act emergency notification or timely warning messages. Most evidence of problems is found in news coverage about campus timely warnings that led to some form of criticism of college or university decision-making about the messages.

The potential for chilling effects associated with the timely warning provision of the law has been a cause for criticism. Shortly after the law was passed, Elizabeth Nuss, executive director of the National Association of Student Personnel Administrators was quoted as explaining that “If a student is a victim of a crime and is very upset emotionally and feels threatened, as a dean I would feel far better if I knew about it, and was able to get some attention to it, even if the student is unwilling to press charges and file a police report. But I won’t be able to do anything if this student doesn’t come to me. And then, we are worse off (Burd, 1992).”

The likelihood that the identity of crime victims, such as victims of sexual assault, might be exposed was another significant concern. Harshman, Puro and Wolff (2001) described their concern that the public availability of crime logs and other information collected and released to comply with the Clery Act could allow people to identify victims and alleged perpetrators, which may deter reporting and victims’ access to critical support services, as well as prevent appropriate disciplinary actions.

Heck (2016) examined the effects of timely warning messages and found evidence of several problems. Heck states that, “As timely warnings are sent out potentially several times throughout a semester to a college campus with no follow-up of the perpetrator being caught or no indication of authorities finding out more information on the perpetrator’s

identity, the idea that a person can get away with sexual assault is reinforced again and again. Therefore, timely warnings serve no purpose in deterring this type of crime in the future.”

Heck also reports that Clery Act timely warning messages can reinforce rape myths. Heck states that “Because Clery releases are designed to be sent to the entire student population, encoded rape myths have the potential to be spread, further engrained and reinforced in campus culture.” She goes on to explain that, “Even including risk-reduction techniques in Clery releases does more harm than good when it comes to perpetuating a victim-blaming, rape-supportive culture....”

As described in the introductory chapter, the potential for timely warning messages to reinforce and perpetuate racial stereotypes has also been a significant concern (Jaschik, 2015; Byers, 2017; Richards, 2017). Although most crime is actually committed by White people, the common perception is that Black people perpetrate the majority of it. Welch (2007) discussed the significance of stereotypes about young Black men in the public perception of crime. Welch states that:

“In American society, a prevalent representation of crime is that it is overwhelmingly committed by young Black men. Subsequently, the familiarity many Americans have with the image of a young Black male as a violent and menacing street thug is fueled and perpetuated by typifications everywhere. In fact, perceptions about the presumed racial identity of criminals may be so ingrained in public consciousness that race does not even need to be specifically mentioned for a connection to be made between the two because it seems that “talking about crime *is* talking about race”(Welch cites Barlow, 1998).”

### **Chapter Summary**

The literature provides a context for understanding the intent and purpose of the Clery Act, which was a response to significant concerns about crime and particularly crime on campus. The literature also indicates that concern about campus crime may reflect feelings and reactions that are shaped by media representation of the issue, and that are not

proportional to data about actual crime rates. Studies of the effectiveness of the Clery Act have been primarily limited to assessment of the impact of the statistical reporting included in notices to prospective students and in Annual Security Reports published by institutions. These studies indicate that the statistical data are not widely read and are perceived to have limited influence on students' choice of institution, students' safety-related behaviors, and on campus crime in general. There was very little literature specifically addressing the effectiveness of Clery Act timely warnings and emergency notifications, and none of that literature evaluated the effectiveness of the messages on a nation-wide basis or from the perspectives of Campus Security Authorities.



### CHAPTER 3: METHODS

This study investigated the effectiveness of the emergency notification and timely warning provisions of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Public Law 105-244), also known as the Clery Act. A questionnaire was utilized to collect data from a randomly selected national sample of professionals charged with compliance responsibilities who work at higher education institutions subject to the requirements of the Clery Act. This study was guided by three research questions as well as a hypothesis associated with each research question as shown in table 3.1.

Table 3.1  
*Research Questions and Hypotheses*

<b>Research Questions</b>		<b>Associated Hypotheses</b>	
RQ-1	Are Clery Act emergency notification and timely warning messages perceived by Campus Security Authorities (CSAs) to be effective tools to improve safety on campuses?	H-1	Clery Act emergency notifications and timely warnings are perceived to be effective tools by CSAs.
RQ-2	To what degree are unintended negative effects associated with Clery Act messages reported to CSAs?	H-2	Unintended harmful effects reported to CSAs are sizeable - including victim blaming, exposing victims' identity, triggering retaliation, re-traumatization of victims, reinforcement of racial stereotypes, provoking fear, misleading people about campus safety, and chilling effects on crime reporting.
RQ-3	Does current training adequately develop CSAs' knowledge and skills related to the writing of Clery Act message content?	H-3	Current training does not adequately develop CSAs' knowledge and skills related to writing Clery Act message content, which contributes to unintended harmful effects.

### **Population and Sampling Frame**

Compliance with the Clery Act is a condition of participation in programs that provide funding under the authority of Title IV (34 CFR part 668) of the Higher Education Act (Public Law 89-329), which includes federal financial aid grants, student loans and work-study programs. The effectiveness of the Clery Act, and the emergency notification and timely warning provisions, in particular, is of interest to students, parents, as well as the faculty and staff at all higher education institutions covered by the law. This study focused on the perceptions of “Campus Security Authorities” at institutions subject to the requirements of the Clery Act.

Campus Security Authorities, as defined by the act, are police and security department employees, individuals responsible for security such as access monitors and resident assistants, individuals designated to receive crime reports and individuals with significant responsibility for student and campus activities (Clery Center, 2018; U.S. Department of Education, 2016). These individuals comprised the theoretical population for this study.

These individuals were believed to be best suited to provide data for this study because they have direct experience monitoring data on their campuses related to crimes covered by the requirements of the act and implementing the emergency notification and timely warning provisions of the law. These individuals were also expected to be familiar with any assessment or evaluation of the messages that have been sent out by their institutions, or any feedback or criticisms that have been reported to their institutions. Because of their direct knowledge and experience, their answers to the questionnaire were

sought so that the data would be suitable for the purpose of answering the research questions and testing the stated hypotheses.

Data from the U.S. Department of Education indicates that there are 6,506 institutions with 11,181 campuses that are subject to the Clery Act (U.S. Department of Education, 2018). There are no comprehensive lists of all Campus Security Authorities working at these institutions, and such a list would be overly burdensome to create. However, a sampling frame from an accessible population of these professionals was available through individuals affiliated with the Clery Center.

Jeanne Clery's parents, Connie and Howard Clery, originally founded the organization as Security on Campus, Inc. in 1987. It has been in continuous operation since that time and is recognized today as the nation's leading non-profit organization engaged in training and advocacy work related to compliance with the Clery Act. The Clery Center's full contact list was obtained, and the Clery Center gave its permission for use of the list for purposes of this research.

Given that the entire population of Campus Security Authorities is not included in the list, and is not practicably knowable, the Clery Center list serves as a sample frame, which posed some risk of coverage error. Dillman, Smyth and Christian (2014, pg. 3) state that coverage error "occurs when the list from which sample members are drawn does not accurately represent the population on the characteristics one wants to estimate with the survey data." The Clery Center list includes fields for the name, title, institution name and email address for 22,917 individuals at 6,272 different organizations, institutions or campuses.

Among the individuals included in the Clery Center contact list, there were some who did not fit into the sampling frame, meaning they were not Campus Security Authorities working at institutions covered by the act. These included members of the media, security consultants, insurance agency employees, sellers of commercial safety products, women's center directors, and sexual violence advocates. These individuals affiliate with the Clery Center given their interest in the law as policy advocates, service providers as well as sellers of commercial products; however, they are not part of the population from whom data was sought for this study. There were also individuals whose status with respect to fit within the sampling frame was not known because their title or institutional affiliation were not indicated in the list.

Because these individuals do not work for institutions covered by the Clery Act and are not directly involved in implementing the emergency notification and timely warning provisions of the Clery Act, or it is not known if they are, they were removed from the list prior to selecting the random sample of recipients. This was accomplished by a manual review of the list in a Microsoft Excel file. The file was sorted by the applicable columns and those with missing institution or job title information, as well as those who could not reasonably be considered Campus security Authorities working at higher education institutions subject to the Clery Act, were deleted. After removal of these individuals, the list comprised 21,176 individuals at 5,569 distinct institutions or campuses who fit the sampling frame. This represents 86% of all institutions nationally. This was assumed to be an adequate sample frame from which to draw a sample that would closely approximate the national population of Campus Security Authorities.

One important caveat to this should be noted, which is that the Clery Center list did not include student employees such as Resident Assistants and Front Desk Attendants charged with monitoring access to buildings. Student employees such as these are regarded as Campus Security Authorities under the act, and they do report crime information to their respective institutions. However, these student employees are not typically involved in compliance aspects of the emergency notification and timely warning provisions of the law and would not be knowledgeable about the information sought in the questionnaire. Therefore, they were appropriate to exclude from the sample frame of this study.

### **Participants**

The 21,176 individuals in the sampling frame were each assigned a randomly generated number, and the list was sorted into random number order. From the randomly sorted list, a sample of 5,000 individuals was selected. A simple random sampling process was utilized because it was expected to produce a sample that could most closely approximate the total theoretical population (all institutions covered by the act) and reduce the risk of coverage error when using the Clery Center list as a sample frame.

To avoid potential bias, the sample was further reviewed to remove individuals working at institutions with which I am currently affiliated (Rowan University and Thomas Jefferson University) or who were known to me personally. Individuals who were known to me or working at institutions with which I am affiliated were removed and replaced with the next alternates from the random numbered list.

The sample size was determined based on the outcome of a pilot using a random sample of 200 individuals drawn from the same Clery Center sample frame list. The results

of the pilot study indicated that as many as 20% of the emails would bounce or fail to reach an active email account for various reasons. In addition, the pilot study indicated that from those that reached an active email account, a completion rate of approximately 10% was likely. For this study, a margin of error of +/- 5% at a confidence level of 95% for the population of 21,176 individuals on the truncated list was sought. In order to achieve that, the minimum number of completed responses was determined to be  $\geq 377$ . The sample size of 5,000 was used because it was expected to yield at least 400 completed responses, assuring the minimum number of responses needed to achieve the desired margin of error.

### **Instrumentation**

A 28-item questionnaire was developed to collect data addressing the research questions and hypotheses. The independent variables used in the study were the respondents' institution sector (public, not-for-profit, and for-profit), institution type (4-year or more, 2-year or less) and enrollment size (4,999 or less, 5,000 to 14,999, and 15,000 and greater). Table 3.2 maps the relationship of the questionnaire items to the research questions and hypotheses and study variables.

Table 3.2

*Mapping questionnaire items to research questions, hypotheses and study variables*

<b>Questionnaire item mapping to research questions and hypotheses.</b>		<b>Item Mapping to Cross-tab Variables Independent (I) Dependent (D)</b>
	1). What functional area(s) do you work in at your institution? Please check all that apply.	
	2). In your current position, are you responsible for any of the following activities related to Clery Act compliance? Please check all that apply:	
R-1	H-1 3). What types of crimes have led your institution to issue Clery Act Timely Warning messages? Note, the crimes listed are those defined by the Clery Act as reportable in the institutions' Annual Security Report. Please check all that apply.	
R-1	H-1 3a). What other types of crimes have led your institution to issue Clery Act Emergency Notifications?	
R-1	H-1 4). What types of emergencies have led your institution to issue Clery Act Emergency Notifications? Please check all that apply.	
R-1	H-1 4a). What other types of emergencies have led your institution to issue Clery Act Emergency Notifications?	
R-1	H-1 5). Do you believe that Clery Act Emergency Notifications and Timely Warning messages issued at your institution help to inform people about safety issues?	D
R-1	H-1 6). Do you believe that Clery Act Emergency Notifications and Timely Warning messages issued at your institution influence people to make immediate (short-term) changes to the ways that they protect themselves?	D
R-1	H-1 7). Do you believe that Clery Act Emergency Notifications and Timely Warning messages issued at your institution influence people to make lasting (long-term) changes to the ways that they protect themselves?	D
R-1	H-1 8). Has a Clery Act Timely Warning messages issued at your institution ever resulted in information or tips being reported that assisted in solving a crime?	D

Table 3.2 continued

*Mapping questionnaire items to research questions, hypotheses and study variables*

<b>Questionnaire item mapping to research questions and hypotheses.</b>		<b>Item Mapping to Cross-tab Variables Independent (I) Dependent (D)</b>
R-1	H-1	9). Do you believe that Clery Act Timely Warnings issued at your institution have been helpful at deterring or preventing crime? D
R-1	H-1	10). How effective do you believe the following methods of distribution of Clery Act Emergency Notifications and Timely Warning messages are? – Email
R-1	H-1	11). Overall, how effective do you believe Clery Act Emergency Notifications and Timely Warning messages issued at your institution are as a tool for improving campus safety? D
R-1	H-1	12). At your institution, are any of following functional area(s) involved in developing the content of Clery Act Emergency Notifications and Timely Warning messages at least sometimes?
R-1	H-1	13). Has your institution ever assessed the perceptions of Clery Act Emergency Notifications and Timely Warning messages issued at your institution? D
R-2	H-2	14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems? D
R-1	H-1	15). Do you believe there are ever situations when Clery Act Emergency Notifications and Timely Warning messages are NOT issued at your institution when they should be? D
R-1	H-1	15a). Can you provide any examples of the types of situations when notifications were not issued when they should have been (please do not identify your institution or any personally identifiable information about anyone involved in the situation)?
R-1	H-1	15b). What do you believe are the reasons why messages are not issued when they should be?



Table 3.2 continued

*Mapping questionnaire items to research questions, hypotheses and study variables*

<b>Questionnaire item mapping to research questions and hypotheses.</b>			<b>Item Mapping to Cross-tab Variables Independent (I) Dependent (D)</b>
R-3	H-3	16). Have you ever participated in any formal training programs to develop your knowledge and/or skills related to the administration of Clery Act requirements?	D
R-3	H-3	16a). Which of the following best describes the training that you received? Please check all that apply.	
R-3	H-3	16b). Have any formal training programs you participated in covered the following subject matter? Please check all that apply.	
R-3	H-3	16c). Do you have any recommendations about ways that Clery Act training could be improved in the future?	
		17). Which of the following best describes the type of institution where you currently work? (institution sector and type)	I
		18). What is the approximate total enrollment of your institution?	I
		19). Which of the following types of environments best describes the primary campus or location of your institution?	
		20). Is there anything else that you would like to share about the subject of Clery Act Emergency Notifications and Timely Warning messages that you believe is relevant to this research?	

### **Pilot Testing**

The instrument was developed through a series of pilot tests. To establish content validity, the first version of the instrument was shared with a small group of colleagues who are Campus Security Authorities. They were asked to check a web-based version of the questionnaire for any problems with the functionality of items and to provide feedback about

ways to improve the questionnaire. Based on their feedback, minor changes were made. The questionnaire was then distributed via a single email invitation to a list serve of Chief Housing Officers of the Mid Atlantic Association of College and University Housing Officers. A total of 13 individuals responded. After reviewing the data and respondents' recommendations about the questionnaire, additional minor changes were made. The revised questionnaire was then sent via a single email invitation to a sample of 200 randomly selected individuals from the Clery Center list. A total of 13 individuals responded to this distribution. The average amount of time required to complete the questionnaire was 8 minutes, with the range being between 4 and 16 minutes.

In addition to the response rate, characteristics of returned email messages were recorded from this trial to aid in later determination of the appropriate sample size. Of the 200 messages sent, 36 resulted in a response that indicated the message was not received by the intended recipient. 27 indicated the message was undeliverable. 2 indicated the individuals were no longer employed at the institution. 1 indicated the institution had closed. 6 indicated the individual was away or on leave, with 1 of those indicating the message would be automatically forwarded to another person. This indicates the response rate was 13 out of 164 recipients or 7.9%.

The reliability of the quantitative items was checked using a Cronbach's alpha calculation. The reliability coefficient was 0.86. According to Creswell and Creswell (2018), the optimal value range for the Cronbach's alpha falls between 0.7 and 0.9, however, the small sample size is an important limitation of this calculation. Data from these first two pilot distributions indicated that respondents understood the instructions and responded to the

items in the intended manner. The data also addressed the constructs within the research questions and hypotheses as expected.

A final round of testing was completed as part of a funded research project supported by the Arlen Specter Center for Public Policy Research Fellowship. This involved sending the questionnaire to a random sample of 1,000 individuals using an initial invitation and a series of three (3) follow-up reminders intended to improve the response rate utilizing social exchange concepts in a manner suggested by Dillman, Smyth and Christian (2016) to increase response rates.

From this distribution, 82 responses were obtained. The results indicated that approximately 200 individuals did not receive the invitation email (emails bounced or messages were returned indicating the individual was no longer working at the institution; an exact count could not be confirmed due to a loss of data in the university email account). The response rate was 10% ( $n = 82$  out of  $\approx 800$ ). The margin of error was +/- 11% at the 95% confidence level. The Cronbach Alpha was .86. These reflect validity and reliability results consistent with the second test. Using data from this pilot study, several items were modified from open-ended (free text response) to items with a list of options from which to choose. The options were determined based on the analysis of data from the pilot study and the change was made to facilitate ease of completion and to improve the response rate.

### **Institutional Review Board**

The study was subject to the oversight of the Institutional Review Board (IRB) of Thomas Jefferson University for human subjects research. The study was determined to be

exempt from formal IRB review. Appropriate documentation of the study and its IRB status were completed (see Appendix 3).

### **Distribution and Data Collection**

The questionnaire was created in the Qualtrics online platform. This platform allowed for distribution of email messages containing a link to the online instrument. In order to encourage a high completion rate, the email messages were constructed to reflect social exchange concepts in a manner suggested by Dillman, Smyth and Christian (2016). Social exchange, as applied to soliciting participants to complete a research questionnaire, acknowledges that respondents typically make quick decisions about whether to respond. These decisions are informed by the efforts that the researcher has made to establish that the study is useful, whether the researcher asks interesting questions and whether the researcher is supported by a legitimate organization. Messages also are designed to appeal for the respondent's help, convey that others have responded and that the opportunity to respond is limited.

To achieve this, I sent an initial email invitation followed by three reminder messages. I shared the purpose of the research, the fact that the research was supported by both the Clery Center as well as the Arlen Specter Center for Public Service and that I had obtained IRB approval. Appendix 2 contains the text of the email messages. I also made an appeal indicating that their help was needed because of their unique perspective and ability to contribute to the data. Data were collected in February and March of 2019.

The Qualtrics platform was selected because it had been contracted by Thomas Jefferson University for research purposes such as this project. The platform was also determined to be

suitable due to several security features it provided, which protect respondents' confidentiality by encrypting transmittal of data and storing data in a manner that is only accessible to those with a password. Because respondents in this study were asked questions that commented on their institutions' (their employers') Clery Act compliance, sensitivity to protecting their confidentiality was considered important.

### **Participant Consent**

All individuals who responded to the email invitation by clicking on the link to the online questionnaire were presented with a voluntary informed consent page before proceeding to the questionnaire. The consent item was as follows:

Thank you for responding to this invitation to participate in research on Clery Act Timely Warnings and Emergency Notifications. Completing this questionnaire should take about 8 minutes. Your participation is completely voluntary and you may decline to participate or skip any question you do not feel comfortable answering. There are no expected risks or discomforts associated with choosing to respond to this questionnaire. Your responses will be kept confidential. No personally identifiable information about you or the institution you work for will be included in any reports based on this research. This research has been approved by the institutional review board at Thomas Jefferson University. If you have any questions about this research, you may contact the principal investigator, Travis Douglas at (phone number was provided – redacted here).

If you would like to receive a report about the results or updates about future publications based on this research, you will be able to enter your contact information in a form linked at the end of the questionnaire. Please note that submission of that information is completely optional and will not impact the research.

**By clicking the "I Agree" option below, you confirm that:**

- You have read the above information
- You voluntarily agree to participate in this research You are at least 18 years of age

## **Data Analysis**

This study relied on quantitative analysis of the data, with minimal inclusion of text form open-ended items as examples. Quantitative data were presented in figures as well analyzed using the cross-tabulations. The statistical calculation tools in the Qualtrics platform were utilized to create the cross-tabulations. Frequencies for appropriate items are reported. Cross-tabs were completed to determine if selected items varied according to respondent's institutional sector, institutional type, or institutional size in a significant way. Chi-square ( $\chi^2$ ), degree of freedom ( $df$ ) and p-value ( $p$ ) are reported for each cross-tabulation to test the significance of any observed variations between groups. The Chi-square statistic was used to detect statistically significant differences, meaning that the observed differences were greater than the level that would be expected due to random chance. Chi square results with a value for  $p \leq 0.05$  were accepted as significant. The effect size for items that were observed to have significant variance was also reported using the Cramer's V statistic. Cohen's (1988) guidelines were utilized to interpret the effect size for the reported for the Cramer's V statistic as small, medium or large. The internal consistency of the instrument was also checked by completing a Cronbach's alpha calculation of the non-demographic items.

## **Limitations**

As with any research, this study has important limitations that should be acknowledged. This study sought data about the perceptions of Campus Security Authorities, as defined by the Clery Act. This means that the data do not directly measure actual safety or security related behavior changes resulting from Clery Act messages or the prevalence of any

problems identified with the messages themselves. These data also do not reflect the perceptions of students, parents, faculty or staff who are not Campus Security Authorities.

A random sample was used drawing from a nationwide sample frame, which should allow these data to be generalizable to the national population of Campus Security Authorities at institutions subject to the requirements of the Clery Act. However, the proportion of respondents from each sector and type of institution did not match national data about the higher education marketplace. Public institutions appear to be somewhat over-represented in the data (60% of respondents vs. 42% of U.S. campuses), while for-profit institutions appear under-represented, comprising a small proportion of respondents (8% of respondents vs. 28% of U.S. campuses). Four-year institutions also appear to be over-represented in the data (74% of respondents vs. 50% of U.S. campuses), while two-year institutions and less than two-year institutions appear under-represented (21% of respondents were 2-year vs. 32% of U.S. campuses; 5% of respondents were less than 2-year vs. 17% of U.S. campuses). There are also discrepancies across groupings by enrollment size. Figures 3.1, 3.2, and 3.3 present comparisons of the study respondents to national Clery Act data reported to the U.S. Department of Education.

The number of responses by sector and type were sufficient for completion of Chi-square analyses yielding significant results on several items. However, no weighting has been applied. Caution should also be used when generalizing these results to sub-groups of institutions with smaller response rates within the data, particularly for-profit and smaller institutions.

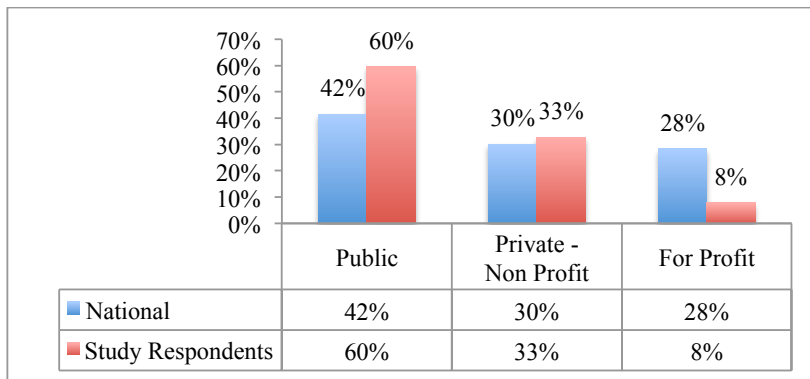


Figure 3.1. Institution sector comparison to national data

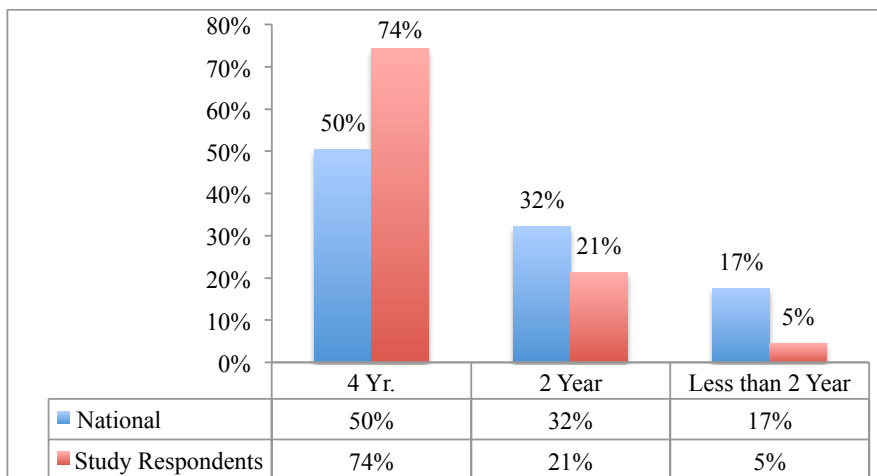


Figure 3.2. Institution type comparison to national data

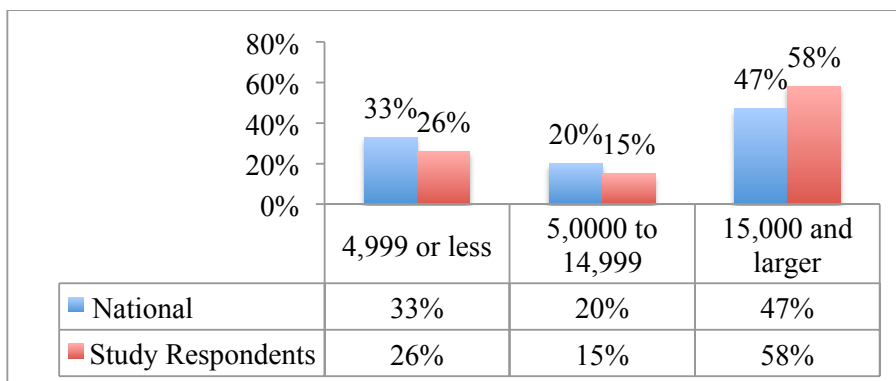


Figure 3.3. Institution enrollment size comparison to national data



It is possible that for-profit and smaller institutions are under-subscribed to the Clery Center directory compared to the nation, or that self-selection bias limited their participation. These institutions may have fewer resources and personnel dedicated to Clery Act work compared to larger and public institutions. Whatever the reasons for the lower response rate from for-profits and small institutions, they comprise an important sector of the higher education marketplace nationally and it would be useful to explore the perceptions and experiences of these sub-groups of institutions more thoroughly in future research.

Bias is also an important potential limitation. Social desirability is one form of bias that may be present in the data. This form of bias occurs when a respondent provides answers they perceive will put themselves in a good light (Dillman, 2014) or in a way that is favorable relative to prevailing social norms (King & Brunner, 2000). Because this study relies on data drawn from individuals reporting their perceptions of the Clery Act compliance activities of their own employer, which is also reflective of their own work, it may be prone to self-report bias. This may arise from the fact that respondents' own perceptions are colored by biased positive self-regard, which may be inconsistent with objective facts about some of the issues explored in this study (meaning they believe what they are reporting, but it is false). It may also arise from respondents' preference to report answers they perceive to be positive about their institution or their own work (they understand what looks good, and choose to report that answer). Another type of respondent bias that may be of concern is acquiescence (Dillman, 2014), meaning answering in a way that they interpret that is desired by the researcher. Given that Clery Act compliance and the issues explored in this study may deal with areas of controversy, respondents may contribute answers they perceive to be the type of answer sought by the researcher.

Another potentially important limitation arises from the work roles of those who responded. The largest groups of respondents were individuals who work directly in campus law enforcement/security roles and in Clery Act compliance roles (most likely those who work as dedicated compliance coordinators to compile crime statistics and prepare their institutions' annual security reports). In many cases, those in Clery Compliance roles come from backgrounds in law enforcement/security and they work within the same public safety departments as those who work in law enforcement or security roles. This could contribute to a limitation in the breadth of perspectives sampled in this study. Very few respondents worked in counseling or health promotions roles. It is likely that professionals in these helping professions have perspectives that are different from the experiences of those in law enforcement/security, or Clery Act compliance. Future study of the perceptions of these groups would likely improve our understanding of the effectiveness and potential problems associated with Clery Act timely warning and emergency notification messages.

## CHAPTER 4: RESULTS AND RESPONDENT CHARACTERISTICS

A random sample of 5,000 individuals from the 21,176 individuals in the redacted Clery Center directory were sent email messages inviting them to participate in the study. Following the initial invitation, 509 emails bounced, reducing the number of individuals who could respond to 4,491. A total of 681 individuals began the questionnaire by affirming their consent to participate, making the initial response rate 15%.

Because this study was intended to explore perceptions of Campus Security Authorities with responsibilities related to compliance with the Clery Act and its timely warning and emergency notification provisions, a screening question was included to assure that individuals completing the questionnaire fit into that frame. Item 2 served as the screening question, asking respondents what activities they participated in related to Clery Act compliance. A total of 97 individuals indicated that none of the activities applied to them, and those individuals were excluded from answering the remainder of the questions.

A total of 514 individuals completed the entire questionnaire and provided usable responses to all items they were eligible to answer. This indicates a completion rate of 10% and a margin of error of +/- 4% at the 95% confidence level. Individual items with fewer responses yield a lower margin of error for that item. The item with the fewest respondents had 449 respondents, resulting in a margin of error of +/- 5% at the 95% confidence level. The reliability of the instrument was calculated using the Cronbach alpha model, and the reliability coefficient was .84, which was within the .07 to .09 optimal range indicated by Creswell and Creswell (2018), and confirmed the internal consistency of the instrument.

Frequencies are reported and illustrated with figures where appropriate. Cross-tabulations were completed for items where a comparison across the independent variable

groups was considered useful. Cross-tabulations are presented in tables with Chi-square ( $\chi^2$ ) calculations to the second decimal, and values of 0.05 or less considered significant ( $\alpha = \leq 0.05$ ). The Cramér's  $V$  statistic is provided for all cross tabulations as a measure of effect size, and Cohen's (1988) guidelines for small, medium and large effect sizes are indicated.

### Respondent Characteristics

The respondents were asked several questions to provide data about their work role and their institution. Figure 4.1 shows the distribution of respondents' functional area (their area of work at their institution). The largest groups among the respondents worked in either campus law enforcement/security or Clery Act compliance roles.

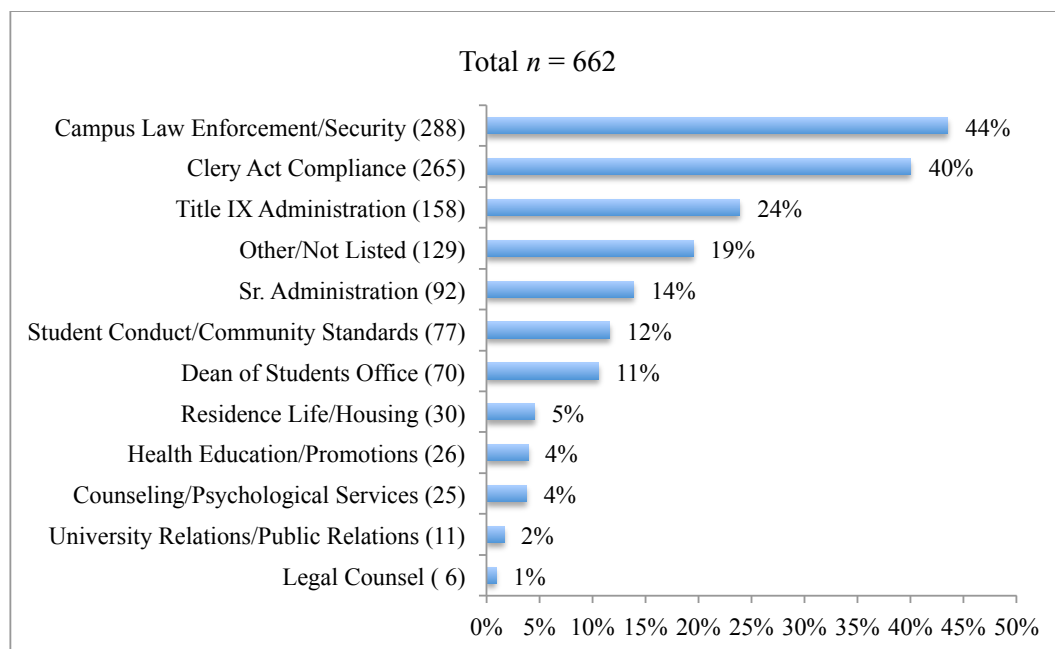


Figure 4.1. Respondents' functional area.

Given that individuals often fulfill multiple roles at higher education institutions, respondents were permitted to indicate all functional areas that applied to them. An analysis of the overlap (individuals working in multiple functional areas) among these roles was completed, and a substantial degree of overlap was observed between those indicating they worked in campus law enforcement/security and Clery Act compliance, with 58% ( $n = 153$ ) of those working in Clery Act compliance indicating they worked in both areas. Many other functional areas had significant overlap with Clery Act compliance due to the fact that this is a responsibility of employees working in many areas. However, no other areas had substantial overlap with the law enforcement/security group. The overlap analysis can be viewed in Appendix 4.

In order to understand the kinds of work that respondents did related to Clery Act compliance, they were asked to indicate what Clery Act compliance activities they had specific responsibility for. Figure 4.2 shows the respondents' Clery Act compliance activities. Among the respondents, 31% ( $n = 200$ ) indicated they were the principal officer/employee responsible for Clery Act compliance at their institution. Thirty-eight percent ( $n = 246$ ) indicated they write the content of timely warning and emergency notification messages at their institutions and 31% ( $n = 197$ ) indicated they were responsible for approving the decision to issue Clery Act timely warning or emergency notification messages at their institution. These indicators confirm that the respondents have substantial responsibility for administration of the key compliance related activities associated with the Clery Act and the timely warning and emergency notification provisions in particular.

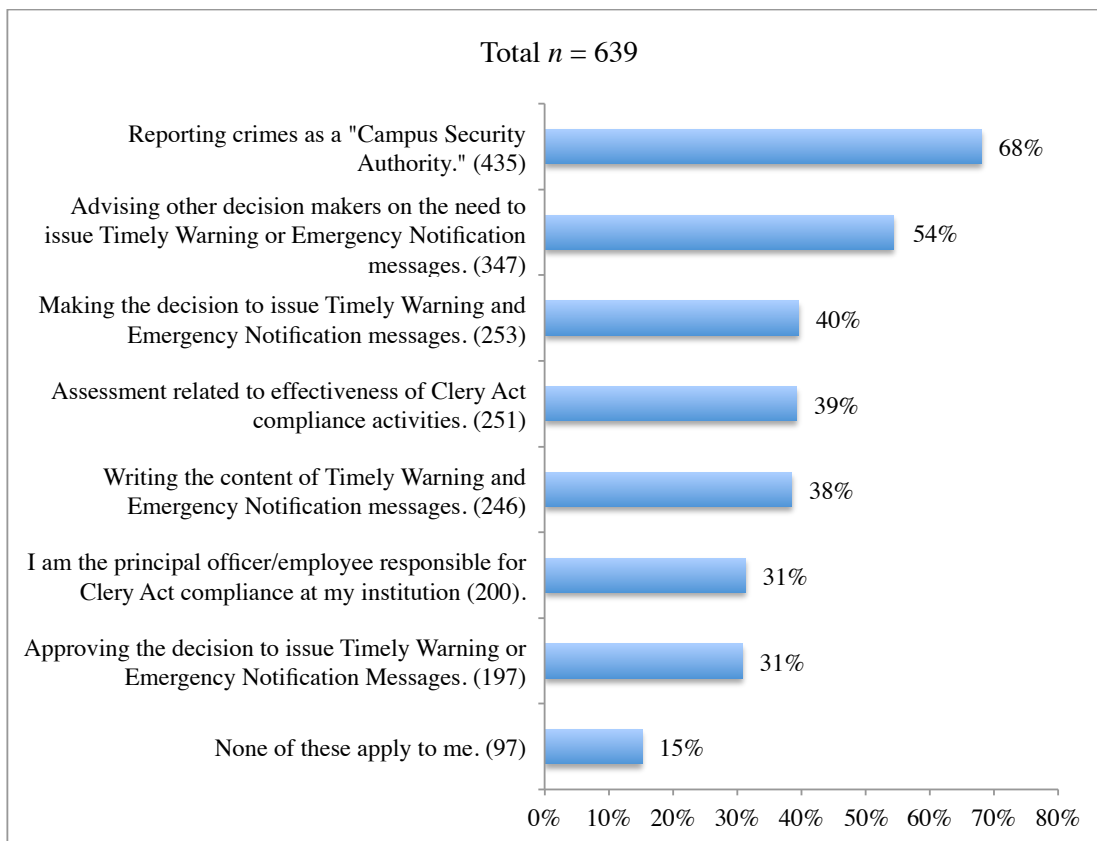


Figure 4.2. Respondents' Clery Act compliance responsibilities

Respondents were from a cross-section of different institution types and sectors. Regarding institution sector, the largest number of respondents, 60% ( $n = 275$ ), reported working at public institutions, while 33% ( $n = 151$ ), reported working at private non-profit institutions, with the smallest group, 8% ( $n = 36$ ), working at private for-profit institutions. Regarding their institution type, 74% ( $n = 275$ ) reported working at 4-year or above institutions while 26% ( $n = 119$ ) reported working at 2-year or less institutions. Figure 4.3 shows the respondents' distribution by institution sector, and figure 4.4 shows respondents' distribution by institution type.

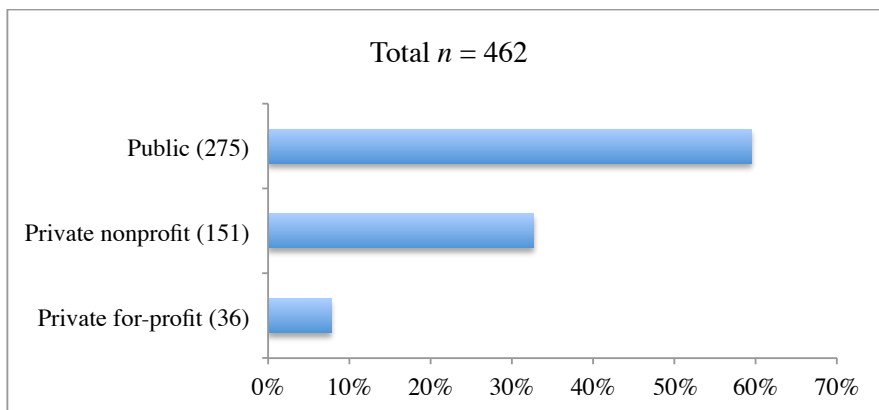


Figure 4.3. Respondents' institution sector.

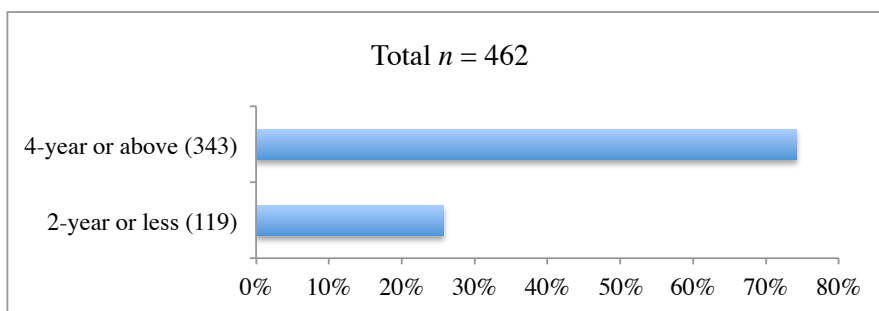


Figure 4.4. Respondents' institution type.

The respondents' institution enrollment sizes were also reported, with 58% ( $n = 469$ ) working at institutions with enrollments of 15,000 and larger, 15% ( $n = 123$ ) working at institutions of 5,000 to 14,999 students, and 26% ( $n = 210$ ) working at institutions with 4,999 or fewer students. Figure 4.5 shows the distribution of respondents' institutions by enrollment size.

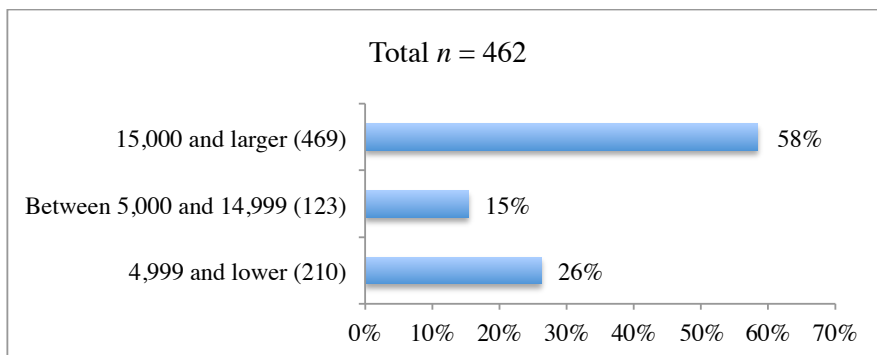


Figure 4.5. Respondents' institution enrollment.

Respondents described the primary location of their institution's campus as 45% ( $n = 207$ ) urban, 32%, ( $n = 148$ ) suburban, and 23% ( $n = 106$ ) rural. Figure 4.6 shows the distribution of respondents' primary location. No respondents ( $n = 0$ ) reported that they worked at a primarily online institution. This is appropriate given that online or distance only institutions are exempt from the requirements of the Clery Act (U.S. Department of Education, 2016).

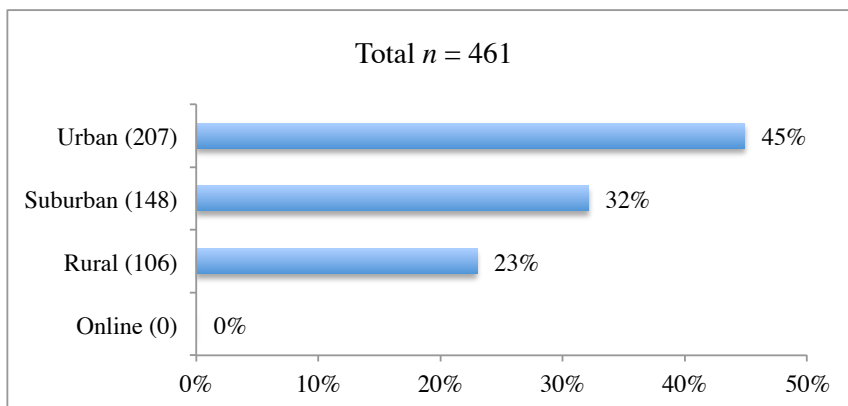


Figure 4.6. Institutions primary campus location



**Chapter Summary**

The response to the questionnaire resulted in an acceptable completion rate (10%) and margin of error (+/- 5% at the 95% confidence level). The data also indicate that the mix of Campus Security Authorities who comprise the respondents came from a variety of functional areas and differing institution types, sectors, and sizes. These factors indicate that the respondent group reflected the desired characteristics and that these data can be generalized to the nation as a whole, with the limitations that were stated including the caution on generalizing to sub-groups such as for-profit and smaller institutions.

## CHAPTER 5: CLERY ACT MESSAGES IN PRACTICE

Research question one (R-1) and its associated hypothesis (H-1), shown again in table 5.1, was posited to explore whether Campus Security Authorities believe that the timely warning and emergency notification provisions of the Clery Act are effectively fulfilling their essential purpose – improving campus safety.

Table 5.1

### *Chapter 5 Research Question and Hypothesis*

<b>Research Question</b>	<b>Associated Hypothesis</b>
RQ-1 Are Clery Act emergency notification and timely warning messages perceived by Campus Security Authorities (CSAs) to be effective tools to improve safety on campuses?	H-1 Clery Act emergency notifications and timely warnings are perceived to be effective tools by CSAs.

The underlying premise of each of the major provisions of the Clery Act was that sharing information would improve campus safety by enabling people to make better safety-related decisions. The provisions requiring collection and disclosure of crime and fire statistics are meant to enable people to understand the safety environment at an institution, as well as to compare that to other institutions. The publication of annual security reports enables people to access those statistics as well as information about institutions' safety-related policies, procedures, and resources. Each of those major provisions is retrospective and leads to reporting that presents the information in an aggregated form. The timely warning and emergency notification provisions are distinct because they are designed to provide a means to alert members of a campus community in real time about specific ongoing situations that may threaten their safety.

To directly address the research question (R-1) and test its associated hypothesis (H-1), Campus Security Authorities' perceptions of several factors that operationalize the overall concept of effectiveness at improving campus safety were explored. These factors included whether messages are effective at informing about safety issues, influencing short and long-term safety-related behaviors, producing tips that solve crime, and whether messages deter crime. In addition, the issue of whether Campus Security Authorities believe campuses ever fail to issue messages when they should have was also explored. This last factor addresses the often asserted concern that institutions may seek to hide crime due to a perception that it is not in their interest to make this information available because of its potential to harm an institution's reputation.

### **Distribution Methods**

Respondents were asked to evaluate the effectiveness of several methods for distributing Clery Act timely warning and emergency notification messages. By far the method perceived to be most effective was text messages ( $M 4.23, SD 0.77$ ). Email was the second most favored method ( $M 3.21, SD 0.94$ ). Robo-calling ( $M 2.43, SD 1.15$ ) and television alerts ( $M 2.34, SD 1.11$ ) were perceived to be the least effective method, with mean scores indicating most respondents felt they were only slightly or not at all effective. Table 5.2 shows the mean scores for respondents' evaluation of each of the methods of distribution.

Table 5.2.

*Effectiveness of message distribution methods*

Item	Mean	SD	<i>n</i>
10). How effective do you believe the following methods of distribution of Clery Act Emergency Notifications and Timely Warning messages are?			
Text Messages	4.23	0.77	479
Email	3.21	0.94	486
Computer Monitor Alerts	3.11	1.12	418
Campus App	3.11	1.11	395
Website	2.81	1.03	461
Robo-calling	2.43	1.15	408
Television Alerts	2.34	1.11	403

Score range from 1= No at all effective to 5 = Extremely Effective.

Because of the methods of distribution used, Clery Act timely warning and emergency notification messages have broad reach, and the messages themselves are immediately actionable. Communication technologies have changed dramatically since the Clery Act became law. In the early years of administration of the law, Clery Act timely warning and emergency notification messages were distributed on campuses as bulletins, often sent by email, but also often printed and posted hard copy to bulletin boards (Greenstein, 2002).

Since then, the development of mass communication technologies like text messaging and the ubiquity of cell phones have dramatically improved the ability of campus administrators to distribute messages. Messages can now be sent immediately after a crime is reported, or in real time during a campus emergency, providing a means to deliver information and provide direction to improve the response and behavior of a campus community during a period of danger.

## Reasons for Sending Messages

The data indicate that campuses have put timely warning and emergency notification messages to good use. Respondents were asked to describe the situations that have required their institutions to issue each type of Clery Act message (see Figure 5.1 and 5.2). The options given for timely warning messages were the crimes defined by the Clery Act, for which institutions are required to consider issuing timely warning messages (U.S. Department of Education, 2016). The most common reasons for sending timely warning messages were robbery, 49% ( $n = 206$ ), rape, 48% ( $n = 201$ ), burglary, 41% ( $n = 175$ ) and aggravated assault, 39% ( $n = 163$ ). The most common reasons for sending emergency notification messages were severe weather, 75% ( $n = 335$ ), dangerous situations near or off-campus, 57% ( $n = 253$ ), and dangerous persons, 34% ( $n = 153$ ).

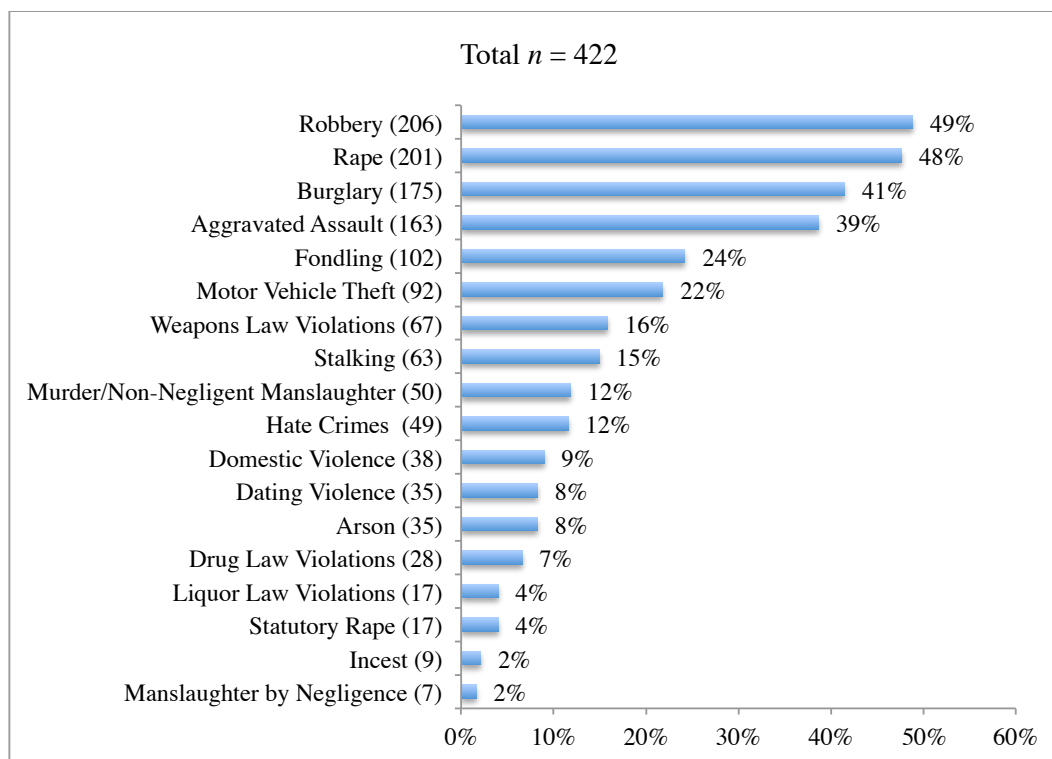
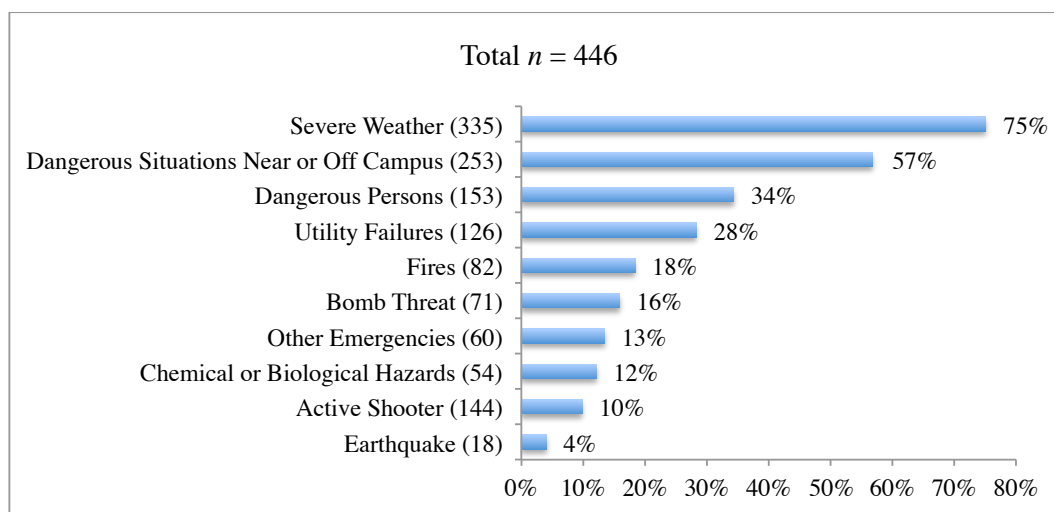


Figure 5.1. Reasons for timely warning messages.



*Figure 5.2.* Reasons for emergency notifications.

It was notable that 57% of respondents reported sending emergency notifications due to dangerous situations near or off campus. The Clery Act defines specific geographic areas that are covered by the law, including the institution's campus, buildings owned or controlled by the institution, places used for classes or student activities (including locations outside the United States), and certain areas that are adjacent to the campus such as public sidewalks and parking areas. The geographic provisions are complex, and properly following them is one source of administrative burden and cost.

Institutions are required to issue timely warning and emergency notification messages when Clery Act crimes are reported or emergencies occur within the institution's Clery Act geography and they represent an ongoing threat. However, they are not required to do so when a crime or emergency occurs outside that geography. If it is their policy to do so, they must do it consistently. This often results in debate about whether to issue messages when

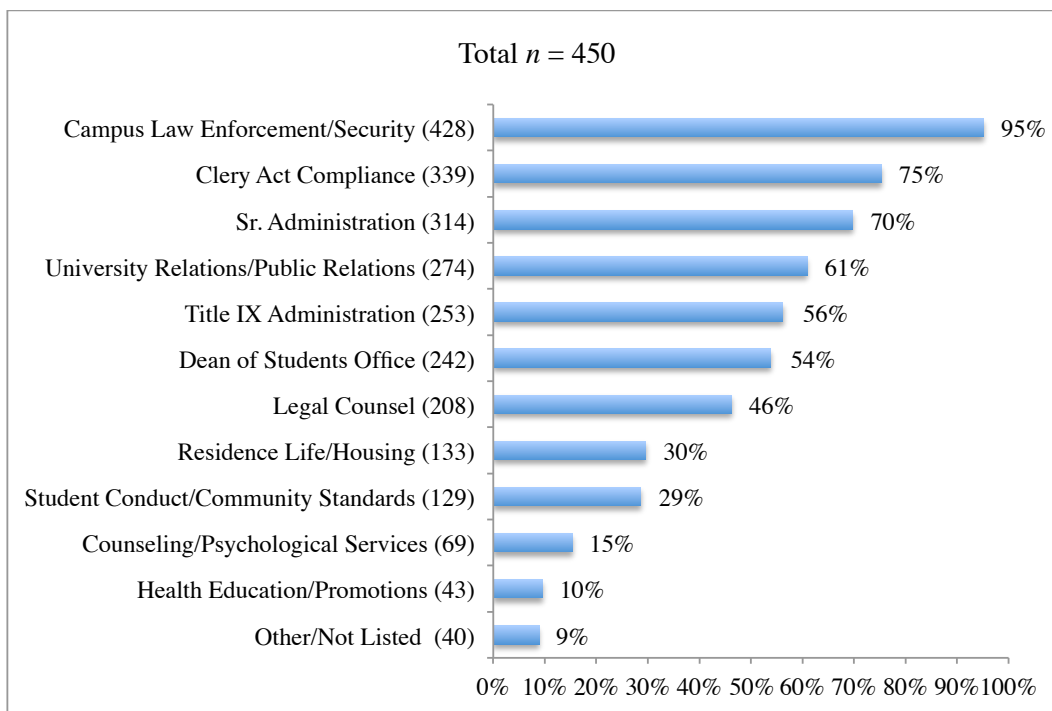
situations fall outside the geography but could be perceived as a threat to the institutions' students, faculty or staff.

In these cases, institutions may be concerned that issuing messages will add to the perception that the institution is not safe, or that the institution will face liability for failing to issue messages in other similar cases that they may not be notified of. However, experts in the field have argued that it is better to warn about off-campus incidents when possible, and that practice is in keeping with the spirit of the law even if it is not a requirement (Hoover & Lipka, 2007; Carter, 2019). This would be an area worthy of further study to better understand institutions' decision-making process and how they address this concern.

### **Message Content Contributors**

Respondents were asked to indicate which functional areas were involved in developing the content, meaning the actual language, included in Clery Act timely warning and emergency notification messages at their institution at least sometimes. Figure 5.3 shows the number of respondents reporting that each of the listed functional areas was involved in developing message content.

Overwhelmingly (95%), those working in campus law enforcement/security were reported to be involved as contributors. Those working in Clery Act compliance (75%), Senior administration (70%), and university/public relations (61%) rounded out the top four. Only 15% of respondents indicated that counseling/psychological services personnel were involved as message contributors, and only 10% indicated that health promotions personnel were involved.



*Figure 5.3.* Contributors to developing message content.

Given that rape is the second most frequent cause of timely warning messages being issued (reported by 57% of respondents), the relative absence of personnel from helping professions and those focused on harm reduction from the message development process is problematic. Due to their education, training, and confidential relationships with students, it is likely that professionals from these fields have perspectives that are very different from those in the law enforcement/security field. The insight and unique knowledge and skills of those in helping fields like counseling and health promotions would add a great deal of value to improving the content of Clery Act messages. Involving them more frequently would likely benefit the campus community, and future research about ways to include them in this process would benefit the profession.



It would be difficult or impractical to involve helping professionals in developing Clery Act messages at the time a crime is reported or an emergency is occurring, and messages must be sent quickly. However, it can be accomplished by engaging them in the process of developing message templates in advance, so that message content is as thoughtfully constructed as possible. National organizations like the Clery Center and professional associations such as The American College Health Association (ACHA), International Association of Campus Law Enforcement Administrators (IACLEA) or the National Association of Clery Compliance Officers and Professionals (NACCOP) could also be instrumental in providing resources to aid in content development, such as a document providing model templates for the most common types of incidents.

### **Effectiveness as a Tool to Promote Campus Safety**

These data confirm that Campus Security Authorities perceived Clery Act messages to be effective in accomplishing their central purpose — to inform people about safety issues to improve campus safety.

**Informing about safety issues.** As shown in figure 5.4, respondents overwhelmingly indicated that they felt Clery Act messages help to inform people about safety issues (89% yes,  $n = 434$ ). Cross-tabs of this item were completed to check whether responses varied by institution sector, type, or size. Table 5.3 shows the results of this cross tab analysis. Significant differences were observed when comparing by institution type ( $\chi^2 = 7.43$ ,  $df = 2$ ,  $p$ -value = 0.02). Respondents from 4-year or above institutions reported that messages were helpful at a higher rate than other groups. The effect size of this difference was checked

using Cramer's  $V$ , which was 0.12, a small effect size, according to Cohen's (1988) guidelines.

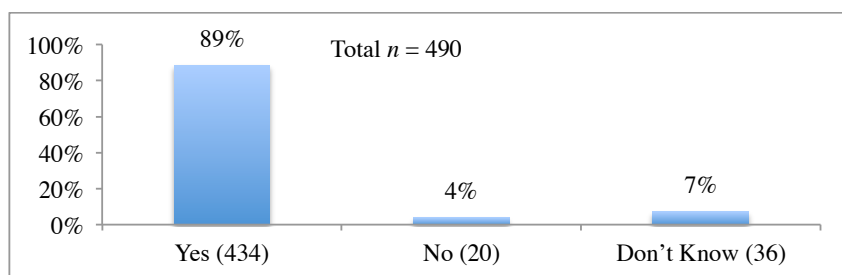


Figure 5.4. Do Clery Act messages help to inform people about safety issues?

Table 5.3

*Do CSA's believe Clery Act messages help to inform people about safety issues?*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>
5). Do you believe that Clery Act Emergency Notifications and Timely Warning messages issued at your institution help to inform people about safety issues?							
<i>Institution Sector</i>				3.16	4	0.53	0.05
Public	244 (89%)	12 (4%)	18 (7%)				
Private Not-for Profit	136 (91%)	3 (5%)	9 (6%)				
Private For-Profit	29 (81%)	3 (8%)	4 (11%)				
Total	409 (89%)	20 (4%)	31 (7%)				
<i>Institution Type</i>				7.43	2	0.02	0.12
4 year or more	307 (90%)	17 (5%)	17 (5%)				
2 year or less	102 (86%)	3 (3%)	14 (12%)				
Total	409 (89%)	20 (4%)	31 (7%)				
<i>Institution Size</i>				5.13	4	0.27	0.07
4,999 or less	178 (86%)	9 (4%)	20 (10%)				
5,000 to 14,999	113 (92%)	5 (4%)	5 (4%)				
15,000 and greater	116 (91%)	6 (5%)	6 (5%)				
Total	407 (89%)	20 (4%)	31 (7%)				

**Influence on safety-related behavior.** Belief that Clery Act messages influence safety-related behaviors — perhaps the most important and specifically intended outcome of the law — was also strongly held (see Figure 5.6). Seventy percent ( $n = 336$ ) of respondents indicated they believed that messages influenced short-term safety-related behaviors with no significant differences across comparison groups. In many cases, such as an active shooter situation or following a series of burglaries, this immediate impact on behavior is very useful.

When asked about longer-term behavior changes, respondents still reported that the messages had an effect, with 24% ( $n = 116$ ) agreeing. However, on the item regarding long-term influence, more respondents indicated that they did not influence long-term behavior change (34%,  $n = 165$ ), or they did not know if they did (43%,  $n = 203$ ).

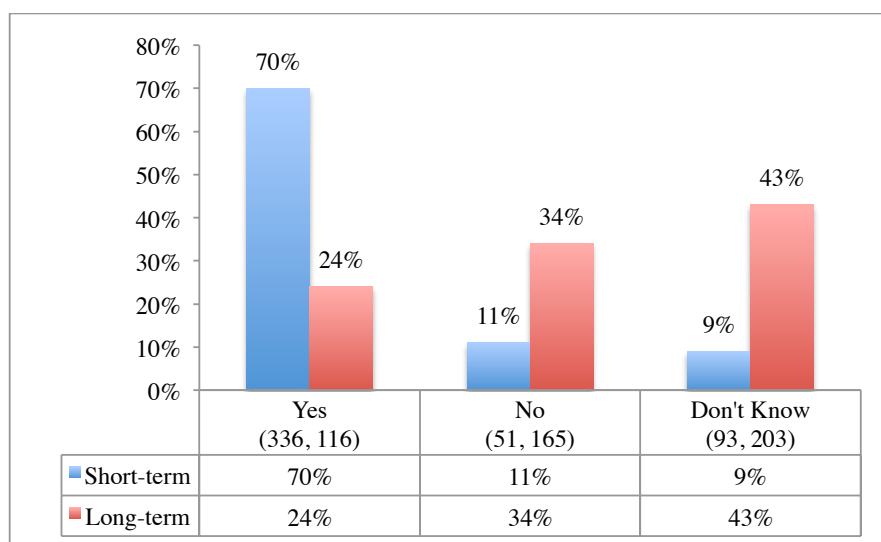


Figure 5.6. Short-term vs. long-term behavior changes

Clery Act timely warnings messages typically include information about how people can reduce the chance of becoming a victim of the specific crime they that triggers the message. Ideally, people would develop better long-term safety habits as a result of the

information shared in Clery Act messages, but it seems respondents are not confident that they have that degree of influence. A future study assessing how these messages actually influence the behavior of message recipients would be beneficial. Also, the faculty and staff of higher education institutions have a great deal of expertise in ways to achieve student learning. Leveraging this expertise to optimize the content of messages in ways that would improve longer-term learning and behavior changes would be a useful effort and would benefit the effectiveness of the Clery Act.

**Solving crime.** Respondents reported that Clery Act messages result in tips that have helped solve crime (see Figure 5.7). This item asked about fact, not belief. Twenty-two percent ( $n = 107$ ) of respondents reported knowing that Clery Act messages have resulted in tips that solved crimes. This is an important finding of a direct benefit resulting from Clery Act messages. Solving crimes, which in most cases means arresting the responsible criminal(s), has a long-term impact because it eliminates a future threat.

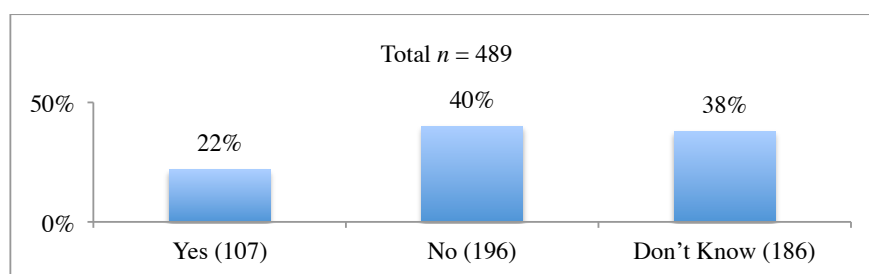


Figure 5.7. Have messages assisted in solving crime?

Cross-tabs regarding the report that messages assisted in solving crime were completed to check whether responses varied by institution sector, type, or size. Table 5.4 shows that significant differences were observed when comparing by institution type ( $\chi^2 =$

23.64,  $df = 2$ ,  $p$ -value  $< 0.01$ ) and size ( $\chi^2 = 31.91$ ,  $df = 4$ ,  $p$ -value  $< 0.01$ ). Respondents at 4-year or more institutions were more likely to report that messages assisted in solving crime. The effect size of this difference was checked using Cramer's  $V$ , which was 0.22, a medium effect size, according to Cohen's guidelines. When comparing by institution size, the rate that respondents reported that messages assisted in solving crimes increased in order of institution size. Respondents at larger institutions reported that Clery Act messages assisted in solving crime at the highest rate. The effect size of this difference was also checked using Cramer's  $V$ , which was 0.18, a medium effect size according to Cohen's guidelines.

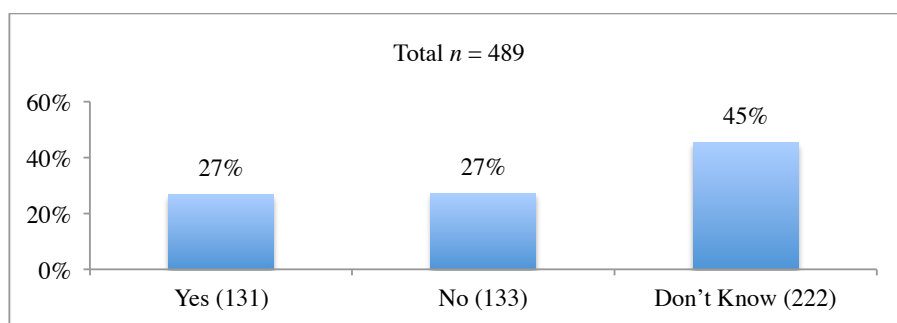
Table 5.4

*Have messages assisted in solving crime?*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>
8). Has a Clery Act Timely Warning messages issued at your institution ever resulted in information or tips being reported that assisted in solving a crime?							
<i>Institution Sector</i>				8.79	4	0.07	0.09
Public	61 (22%)	104 (38%)	108 (40%)				
Private Not-for Profit	39 (28%)	55 (37%)	55 (37%)				
Private For-Profit	4 (11%)	22 (61%)	10 (28%)				
Total	104 (23%)	181 (40%)	173 (38%)				
<i>Institution Type</i>				23.64	2	0.00	0.22
4 year or more	90 (26%)	113 (33%)	137 (40%)				
2 year or less	14 (12%)	68 (58%)	36 (31%)				
Total	104 (23%)	181 (40%)	173 (38%)				
<i>Institution Size</i>				31.91	4	0.00	0.18
4,999 or less	36 (17%)	99 (48%)	73 (35%)				
5,000 to 14,999	27 (22%)	58 (48%)	37 (30%)				
15,000 and greater	41 (32%)	25 (20%)	62 (48%)				
Total	104 (23%)	182 (40%)	172 (38%)				

**Deterring crime.** Clery Act messages were also reported to help deter crime.

Twenty-seven percent ( $n = 131$ ) of respondents indicated that they believed that Clery Act messages have been helpful at deterring crime (see Figure 5.8). Like the finding that Clery Act messages help solve crime, this is also an important finding of a direct benefit. Clery Act messages reach nearly all members of a campus community, and they have an immediate effect on people's awareness of criminal patterns of behavior, suspect descriptions, and vulnerabilities that can be mitigated quickly. All of these help to reduce the likelihood that criminals will choose to continue a pattern of crime on a campus after a warning has been issued, as well as their ability to be successful if they attempt to commit crime.



*Figure 5.8.* Have Clery Act timely warning messages prevented or deterred crime?

Cross-tabs regarding the belief that messages were helpful at deterring or preventing crime were completed to check whether responses varied by institution sector, type, or size. No significant differences were found.

### **Failure to Warn - Hiding Crime.**

One belief that is often raised as a justification for the Clery Act and the need for rigorous enforcement of its provisions has been that institutions seek to hide or obscure data

about crime. This was, in essence, the concern that the Clery's had about Lehigh University, and it has been explored in studies of Clery Act data in more recent years. In 2008, The Center for Public Integrity completed an analysis of Clery Act data and concluded that far more cases of sexual assault occur than are reported in institutions' Annual Security Reports (Lombardi, 2009). The report cited Mark Goodman, the former director of the Student Press Law Center. He described his belief that the suspicious absence of reports of rape in Clery Act data indicated a likelihood that institutions were "intentionally misinterpreting their obligations under Clery and weeding out reports in order to protect their reputations as safe campuses." The report also went into detail to explain reasons why many survivors of sexual violence may not report incidents, and also that Clery Act provisions that exempt licensed mental-health and pastoral counselors from the reporting requirements may explain why Clery statistics underrepresent the rates of crime compared to what is actually occurring. Several years later, in 2009, the American Association of University Women (AAUW) wrote a similar report, which raised alarm that 91% of institutions reported zero rapes (AAUW, 2015).

With respect to timely warnings and emergency notifications, the concern that institutions do not report accurate crime statistics would translate to a fear that institutions may avoid issuing messages they worry will harm their reputation and deter enrollment.

When asked directly about whether there were ever situations at their institutions when messages were not sent when they should be (see figure 5.9), 18% ( $n = 85$ ) said yes while 82% ( $n = 375$ ) said no. A large majority did not feel this was occurring, but 18% is a troubling number given the implication that it may indicate that institutions are avoiding sending required messages.

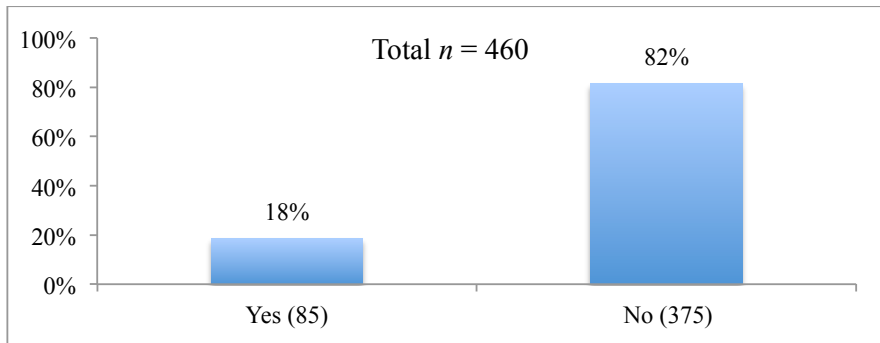


Figure 5.9. Are Clery Act messages ever not issues when they should be?

### Assessment

Respondents were also asked whether their institution had ever assessed the perceptions of Clery Act emergency notification and timely warning messages at their institution. Figure 5.10 shows that the majority of respondents indicated their institutions that the perceptions of messages (43%,  $n = 208$ ), or they did not know if they had (35%,  $n = 171$ ). Only 18% ( $n=87$ ) reported they had completed assessment.

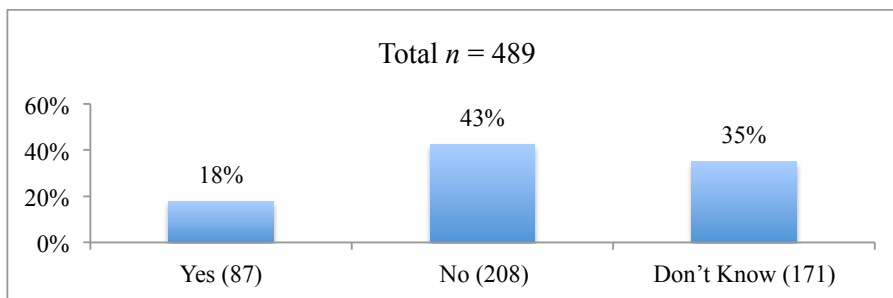


Figure 5.10. Institutional assessment of perceptions of messages.

Cross-tabs regarding assessment of perceptions of Clery Act messages were completed to check whether responses varied by institution sector, type, or size. Table 5.5



shows that significant differences were observed when comparing by institution sector ( $\chi^2 = 10.81$ ,  $df = 4$ ,  $p\text{-value} = 0.03$ ) and size ( $\chi^2 = 19.17$ ,  $df = 4$ ,  $p\text{-value} < 0.01$ ). Respondents at public and private non-profit institutions were more likely to report that messages were assessed than those at for-profit institutions. The effect size of this difference was checked using Cramer's  $V$ , which was 0.10, a small effect size, according to Cohen's guidelines. Comparing across size, the number of respondents reporting that assessment was completed was relatively similar, and the primary differences were among those reporting "No" or "Don't know," so this was not considered an important variation.

Table 5.5

*Assessment of perceptions of Clery Act messages*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>
13). Has your institution ever assessed the perceptions of Clery Act Emergency Notifications and Timely Warning messages issued at your institution?							
<i>Institution Sector</i>				10.81	4	0.03	0.10
Public	54 (20%)	108 (39%)	112 (41%)				
Private Not-for Profit	25 (17%)	81 (55%)	42 (28%)				
Private For-Profit	4 (11%)	18 (50%)	14 (39%)				
Total	83 (18%)	207 (45%)	168 (37%)				
<i>Institution Type</i>				0.82	2	0.66	0.04
4 year or more	65 (19%)	153 (45%)	123 (36%)				
2 year or less	18 (15%)	54 (46%)	45 (38%)				
Total	83 (18%)	207 (45%)	168 (37%)				
<i>Institution Size</i>				19.17	4	<0.01	0.14
4,999 or less	36 (17%)	111 (54%)	60 (29%)				
5,000 to 14,999	23 (19%)	5 (46%)	43 (35%)				
15,000 and greater	23 (18%)	40 (31%)	65 (51%)				
Total	82 (18%)	40 (31%)	65 (51%)				

The finding that almost no institutions engaged in any significant or formal assessment of their timely warning and emergency notification messages is problematic. It is also troubling that the for-profit sector, in particular, did not engage in assessment relative to the other sectors. Assessment efforts are an important aspect of improving our practice in higher education, and work related to campus safety and compliance with the Clery Act should be no exception. If institutions engage in assessment efforts, they may find ways to improve their practice themselves apart from any guidance or training that may eventually become available from the Department of Education, consultants, or professional organizations.

#### **Overall, how effective are Clery Act messages?**

Overall, respondents felt that Clery Act timely warning and emergency notification messages are moderately effective as a tool for improving campus safety. The mean score on a 5-point scale was 3.24, with 1 being not at all effective, 3 being moderately effective, and 5 being extremely effective (see Table 5.5).

Table 5.6

*Overall opinion of timely warning messages as a tool for improving campus safety*

Item	Mean	SD	n
11). Overall, how effective do you believe Clery Act Emergency Notifications and Timely Warning messages issued at your institution are as a tool for improving campus safety?	3.24	0.93	481

Score range from 1= No at all effective, 3 = Moderately effective, 5 = Extremely Effective.

## **Chapter Summary**

The data indicate that Clery act messages are perceived to be effective in many respects. Current distribution methods, including text messages and emails make delivery of Clery act timely Warning and emergency notifications relatively easy to accomplish. Timely warning messages are sent for a variety of reasons, including some of the most substantial sources of risk to campus communities, such as robbery, rape, aggravated assault. Likewise, emergency notifications are sent for very significant reasons including severe weather events, dangerous persons, fires, and active shooters. The messages are perceived by significant number of Campus Security Authorities to have an influence on short-term safety-related behaviors, and many also perceived an influence on long-term safety-related behavior. Campus Security Authorities also reported positive effects including the fact that Clery Act messages deter crime and lead to tips that helped solve crime. These effects are consistent with the intent of the Clery act and indicate that the timely warning and emergency notification provisions are an essential and useful feature of the overall law. Campus security Authorities reported very little activity related to assessment of the perceptions of Clery Act messages at their institutions. Overall, Campus Security Authorities reported they believe that Clery Act messages are a moderately effective tool for improving campus safety.

## CHAPTER 6: UNINTENDED HARMFUL EFFECTS

Research question two (R-2) and its associated hypothesis (H-2), restated in Table 6.1, was included to explore the unintended harmful effects associated with Clery Act messages. This question emerged from my own experiences with messages that were well intended and complied with Clery Act requirements, but seemed to result in outcomes that were harmful, or at least counter-productive in some way. The hypothesis (H-2) was shaped by that personal experience, as well as the literature review, which mostly comprises media reports about timely warning messages that resulted in harmful effects, including:

- Victim blaming (Greiss, 2016; Heck, 2016)
- Exposing the identity of victims who report crime (Greiss, 2016)
- Retaliation against those who report crime (Greiss, 2016)
- Racial stereotyping (Welch, 2007; Jasichik, 2015; Byers, 2017; and Richards, 2017)
- Provoking fear (Heath, 1984; Kaminski, 2010; and Baum, 2017)
- Misleading people about campus safety (Burd, 1992)
- Chilling effects on crime reporting (Burd, 1992)

Table 6.1

*Chapter 6 Research Question and Hypothesis*

<b>Research Question</b>	<b>Associated Hypothesis</b>
RQ-2 To what degree are unintended negative effects associated with Clery Act messages reported to CSAs?	H-2 Unintended harmful effects reported to CSAs are sizeable - including victim blaming, exposing victims' identity, triggering retaliation, re-traumatization of victims, reinforcement of racial stereotypes, provoking fear, misleading people about campus safety, and chilling effects on crime reporting.

To directly address this question and test the hypothesis, respondents were asked to report whether anyone had ever expressed concern that Clery Act timely warning messages at their institution could result in the types of problems included in the hypothesis (H-2), as well as several others that were included based on the results of pilot studies. Figure 5.1 shows the frequency of respondents answering yes when asked whether anyone at their institution had expressed concern that Clery Act timely warning messages could result in these problems. These data confirm that there is substantial concern that Clery Act messages can cause the sort of unintended harms described in the hypothesis.

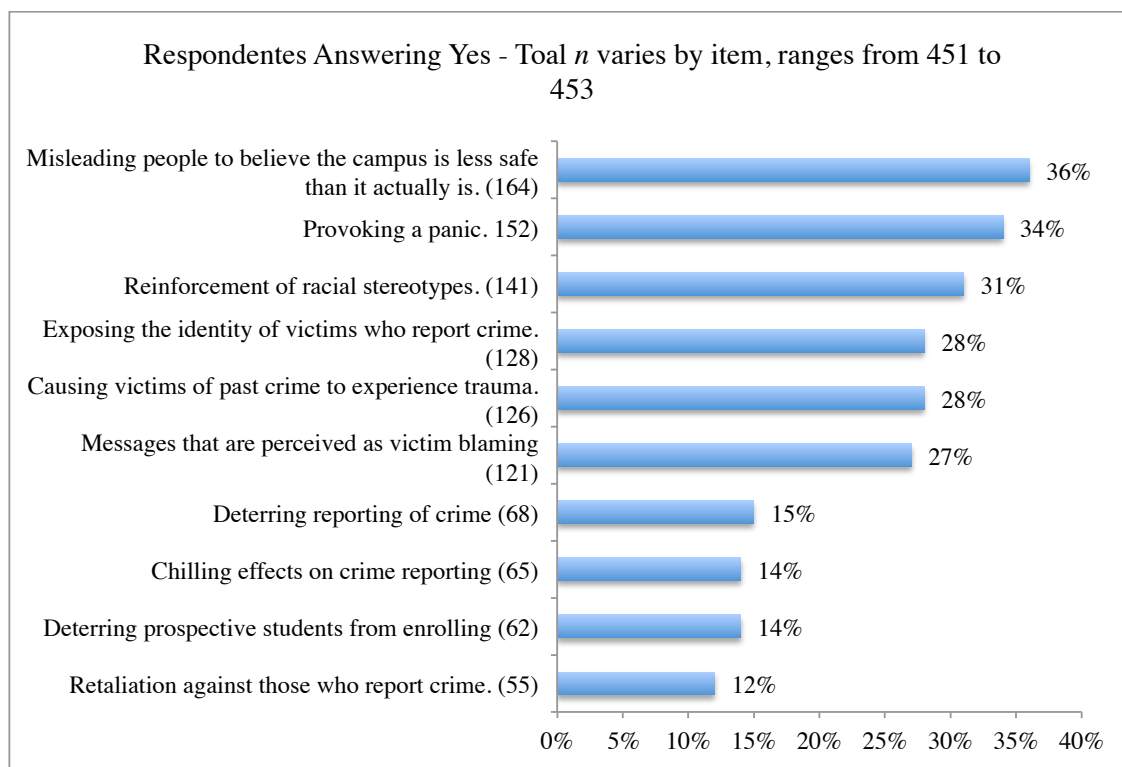


Figure 6.1. Reported problems with Clery Act messages

Nearly every respondent indicated some concern that can be traced to the perceptions or results of the content included in Clery Act messages. The data show that these concerns are not merely anecdotal cases that arose in a few media reports. They are systemic effects of the law that are occurring on a national scale.

**Misleading and provoking fear.** The top two problems reported were the potential for messages to mislead people to believe that campuses are less safe than they actually are (36%,  $n = 164$  answering yes), and provoking fear or panic (34%,  $n = 152$  answering yes).

Clery Act administrators — those responsible for issuing messages at institutions, which is a more narrow subset of Campus Security Authorities — are careful and thoughtful when reviewing reports and making the decision to send out a timely warning or emergency notification message. These findings seem to reflect their concern that messages could have an unintended effect that would be counter-productive to the promotion of campus safety. The Clery Act requires messages about crimes and circumstances that are reported that may pose an ongoing threat to the campus community.

However, administrators are aware that messages may be interpreted in a way that leads to unwarranted fear of a situation or to mean that the campus is not safe when in fact, in the broader context of the surrounding community, it is relatively safe compared to other places. This is evidenced by comparisons of campus crime data indicating that crime rates are generally higher off campus in surrounding communities than on the typical college or university campus (Volkwein et al., 1995).

This finding also reflects administrators' understanding of the ripple effects that messages can produce. When messages are sent out, their content can be surprising or even shocking, as evidenced by the ways that media cover events when timely warning messages

are issued. Media coverage can be very purposeful and important in managing emergency situations or in raising awareness to solve patterns of crime. However, some media coverage seems as if it is focused on grabbing attention (sensationalizing) and designed to benefit the media entities' viewership or ratings rather than a genuine interest in promoting awareness of safety issues. For instance, respondents commented:

- "...My experience is that the alerts serve as an instant notice to all local media that something has occurred at or near campus. Subsequently, the media takes stories and runs with them by interviewing students, staff, and faculty for days. The stories generally interview students (or search until they find the correct response from a student) based upon how they respond to what ever [sic] the context [sic] of the alert. This is an overview and not an improvement."
- "Also, we never get follow up messages. We get startling timely warnings about things happening on or around our campus, and then no follow up to share the outcome or is [sic] the issue has been resolved. This causes panic among our students."

Because this issue may vary across different contexts, crosstabs for regarding the potential for messages to be misleading about campus safety were completed to check whether responses varied by institution sector, type, or size (see Table 6.2). Significant differences were observed when comparing by institution type and size. Respondents at 4-year institutions were more likely to report the concern that messages are misleading ( $\chi^2 = 13.91$ ,  $df = 2$ ,  $p$ -value  $< 0.01$ ). The effect size of this difference was checked using Cramer's  $V$ , which was 0.17, a small effect size, approaching medium, according to Cohen's (2008) guidelines. Respondents at larger institutions were also more likely to report this concern ( $\chi^2 = 14.07$ ,  $df = 4$ ,  $p$ -value = 0.01). The effect size of this difference was checked using Cramer's  $V$ , which was 0.12, a small effect size, approaching medium, according to Cohen's guidelines.

Table 6.2

*Misleading people about campus safety*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	<b><math>x^2</math></b>	<b><i>df</i></b>	<b><i>p</i></b>	<b><i>V</i></b>
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?							
<i>Institution Sector</i>				8.54	4	0.07	0.09
Public	105 (39%)	110 (41%)	51 (19%)				
Private Not-for Profit	53 (36%)	65 (44%)	29 (20%)				
Private For-Profit	5 (14%)	21 (60%)	9 (26%)				
Total	163 (36%)	196 (44%)	89 (20%)				
<i>Institution Type</i>				13.91	2	< 0.01	0.17
4 year or more	137 (41%)	131 (39%)	66 (20%)				
2 year or less	26 (23%)	65 (57%)	23 (20%)				
Total	163 (36%)	196 (44%)	89 (20%)				
<i>Institution Size</i>				14.07	4	0.01	0.12
4,999 or less	56 (28%)	101 (50%)	45 (22%)				
5,0000 to 14,999	48 (40%)	53 (44%)	20 (17%)				
15,0000 and greater	58 (47%)	42 (34%)	24 (19%)				
Total	162 (36%)	196 (44%)	89 (20%)				

Crosstabs regarding the potential for messages to provoke fear were also completed to check whether responses varied by institution sector, type, or size (see Table 6.3). A significant difference was observed when comparing by institution type. Respondents at 4-year institutions were more likely to report the concern that messages may provoke fear ( $x^2 = 11.13$ ,  $df = 2$ ,  $p$ -value  $< 0.01$ ). The effect size of this difference was checked using Cramer's  $V$ , which was 0.15, a small effect size, approaching medium, according to Cohen's guidelines.



Table 6.3

*Provoking fear*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?							
<i>Institution Sector</i>				6.23	4	0.18	0.08
Public	99 (37%)	113 (42%)	55 (21%)				
Private Not-for Profit	45 (31%)	71 (48%)	31 (21%)				
Private For-Profit	6 (18%)	20 (59%)	8 (24%)				
Total	150 (33%)	204 (46%)	94 (21%)				
<i>Institution Type</i>				11.13	2	< 0.01	0.15
4 year or more	123 (37%)	137 (41%)	74 (22%)				
2 year or less	27 (24%)	67 (59%)	20 (18%)				
Total	150 (33%)	204 (46%)	94 (21%)				
<i>Institution Size</i>				4.73	4	0.32	0.07
4,999 or less	62 (31%)	98 (49%)	42 (21%)				
5,000 to 14,999	39 (32%)	60 (50%)	22 (18%)				
15,000 and greater	48 (39%)	47 (38%)	29 (23%)				
Total	149 (33%)	205 (46%)	93 (21%)				

**Reinforcing racial stereotypes.** That timely warning messages may reinforce racial stereotypes was the third most reported problem, with 31% ( $n = 141$  answering yes) indicating that this problem had been reported to them. This is consistent with media reports indicating that suspect descriptions included in timely warning messages have been a source of distress when they included racial descriptors (Jaschik, 2015; Byers, 2017; and Richards, 2017).

Because this issue may vary across different contexts, crosstabs regarding the potential for messages to reinforce racial stereotypes completed to check whether responses varied by institution sector, type, or size (see Table 6.4). Significant differences were observed when comparing by institution type and size. Respondents at 4-year institutions were more likely to report the concern that messages may contribute to reinforcement of racial stereotypes ( $\chi^2 = 32.78$ ,  $df = 2$ ,  $p$ -value  $< 0.01$ ). The effect size of this difference was checked using Cramer's  $V$ , which was 0.27, a medium effect size, approaching large, according to Cohen's guidelines. Respondents at larger institutions, particularly those with enrollments of 15,000 or more were also more likely to report this concern ( $\chi^2 = 14.07$ ,  $df = 4$ ,  $p$ -value = 0.01). The effect size of this difference was checked using Cramer's  $V$ , which was 0.23, a large effect size according to Cohen's guidelines.

It is noteworthy that the problem of potential reinforcement of racial stereotypes was most strongly perceived by Campus Security Authorities working at larger, 4-year institutions. These types of institutions are likely to be racially diverse, and because of their size, the volume and frequency of cases implicating race issues are likely to be greater than at smaller institutions. While this should not indicate that administrators at smaller or 2-year institutions should not be mindful of this issue, it would be wise for administrators who do work at larger, 4-year institutions to consider this issue and to make reasonable efforts to assure that messages do not improperly implicate race.

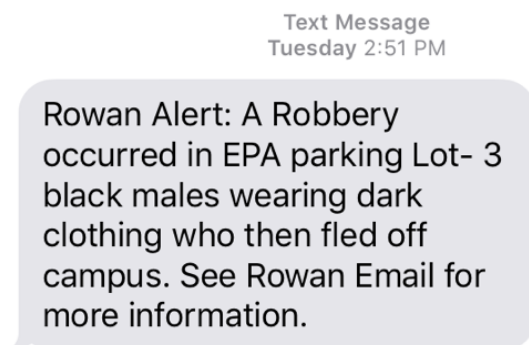
Table 6.4

*Reinforcement of racial stereotypes*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$x^2$	<i>df</i>	<i>p</i>	<i>V</i>
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?							
<i>Institution Sector</i>				9.50	4	0.05	0.10
Public	86 (32%)	110 (41%)	71 (27%)				
Private Not-for Profit	49 (34%)	66 (46%)	30 (21%)				
Private For-Profit	4 (11%)	22 (63%)	9 (26%)				
Total	139 (31%)	198 (44%)	110 (25%)				
<i>Institution Type</i>				32.78	2	< 0.01	0.27
4 year or more	126 (38%)	125 (37%)	83 (25%)				
2 year or less	13 (12%)	73 (65%)	27 (24%)				
Total	139 (31%)	198 (44%)	110 (25%)				
<i>Institution Size</i>				47.57	4	< 0.01	0.23
4,999 or less	44 (22%)	112 (56%)	45 (22%)				
5,000 to 14,999	31 (26%)	60 (50%)	29 (24%)				
15,000 and greater	64 (51%)	25 (20%)	36 (29%)				
Total	139 (31%)	197 (44%)	110 (25%)				

When crimes are reported, descriptions of suspect characteristics, including race, are provided in timely warning messages to meet the obligation to share pertinent facts about the reported crime. This is intended to enable people to use the information to protect themselves and reduce the chances of becoming a victim of future crime, as well as assist in identification of perpetrators. However, when descriptions are ambiguous, the inclusion of race may be unhelpful at accomplishing that protective purpose while causing harm instead.

For instance, one timely warning message issued at Rowan University in 2017 included a racial description that was criticized:



*Figure 6.2.* Rowan University timely warning message

The text message implicates race without providing sufficient descriptive details to allow people to identify or avoid any particular individual(s). Any Black male at the institution could be included as a potential suspect given this description, and students reported to me that this was how the message made students of color feel.

Improving message content would help to address this issue. Greenstein (2002, pg. 65) examined this issue through a qualitative study consisting of focus groups at the University of California, Los Angeles. Greenstein found that students cautioned against vague descriptions that include race, which may be perceived as a form of racial profiling. One focus group member said, “How can we base identification on a description as an African American male, 5 feet 10 inches tall, 21 – 23 years of age with short hair, since this description describes many individuals?” Greenstein shared that she no longer used race in a suspect description included in timely warning messages, and instead includes information describing skin tone, such as “medium complexion.” Students thought that was preferable.

Greenstein (2002) also found that people preferred to receive pictures when they are not ambiguous. If photographs or security camera footage are available, and can clearly show the suspect, then messages with a link to the images would likely be preferable versus using written descriptions, particularly those that include race. Such messages would be helpful and avoid the ambiguity of written suspect descriptions.

When images are not available, unambiguous information is what is needed. That would mean suspect descriptions that can provide sufficient detail that someone could use the description to recognize an individual as a likely suspect and report them or avoid contact with them. When that type of unambiguous information is simply not available, it may be better not to include descriptions that include race, an approach that some institutions have elected to adopt as their policy (Jaschik, 2015; Byers, 2017; Richards, 2017).

The Handbook for Campus Safety and Security Reporting (U.S. Department of Education, 2016) indicates, “the warning should include all information that would promote safety and that would aid in the prevention of similar crimes.” Administrators should consider whether providing an ambiguous suspect description that implicates race helps to promote safety? Messages should certainly provide pertinent information about the crime itself and the conditions that may make people vulnerable to that crime, along with tips to reduce or mitigate that risk. That type of message would fulfill the intent of the Clery Act without causing harm. However, the adage that more information is better than less may not hold true in this particular context, and inclusion of race when the suspect description will be ambiguous may not be helpful.

**Impacting victims of crime.** Several of the reported problems were related to harmful impacts on victims of crime. Exposing the identity of victims who report crime was

a problem reported by 28% ( $n = 128$  answering yes) of respondents. Causing victims of past crimes to experience trauma was a problem that 28% ( $n = 126$  answering yes) of respondents indicated had been reported to them, and 27% ( $n = 121$  answering yes) reported that messages being perceived as victim blaming had reported to them. The problem of retaliation against those who report crime, which stems from the issue of exposing their identity, was reported by 12% ( $n = 55$  answering yes) of respondents.

Each of these issues arises from some aspect of the message content or how the messages are disseminated on college and university campuses. As discussed in the previous chapter, technology has evolved considerably since the passage of the Clery Act. Today, Clery Act messages are primarily distributed using digital mass communication systems such as email and text messaging. These systems push the message out to the campus population instantly, in all places (in residence halls, dining halls, classrooms) and at any time of the day or night. The prevalence of social networking systems often means that, in response to a Clery Act message, many additional messages are shared among members of a campus community. This type of communication can be enormously beneficial from the perspective of informing a community about something that may pose an ongoing threat and providing immediate access to information that can be used by people to protect themselves.

However, the nature of this communication can also contribute to the problems identified by the respondents. The message may surprise the victim who reported the crime, without giving her time to prepare for the what may seem to be her entire community discussing a potentially personal, sensitive and violent crime she experienced only hours before. For victims of past crimes, the message may intrude into an otherwise normal day for a victim who has experienced trauma due to a past crime, resurfacing negative feelings and

emotions associated with a past traumatic experience. For instance, a sexual assault survivor on her way to an early morning Chemistry class may suddenly see a message that resurfaces memories of her own past traumatic experience, and then need to manage her post-traumatic stresses while trying to focus on learning class material, or taking a test. In some cases, when details shared about the nature, time, and location of the crime are shared, that information reveals to others involved in the incident that the victim has reported the crime. For instance, an assault at a fraternity party may involve witnesses who are allied with either the victim or the perpetrator. When a message is sent that includes a constellation of facts that the community knows and attributes to a particular person (such as a friend) or group, the result can be that the victim's identity is exposed. That fact can then result in retaliation as others, perhaps a perpetrator himself, harass the victim seeking to stop cooperation in an investigation or harm her reputation in the community at large.

Because this issue may vary across different contexts, crosstabs regarding the potential for messages to expose the identity of victims who report crime was completed to check whether responses varied by institution sector, type, or size (see Table 6.5). A significant difference was observed when comparing by institution type. Respondents at 4-year institutions were more likely to report the concern that messages may expose the identity of victims who report crime ( $\chi^2 = 14.34$ ,  $df = 2$ ,  $p$ -value  $< 0.01$ ). The effect size of this difference was checked using Cramer's  $V$ , which was 0.17, a small effect size, approaching medium, according to Cohen's guidelines. This is notable because, similar to the effect associated with racial stereotyping, 4-year institutions by their nature may be more likely to be where these types of issues emerge. This may be because 4-year universities are

where the kinds of social dynamics, such as large on-campus housing populations and Greek life programs, which can exacerbate this issue, are more likely to exist.

Table 6.5

*Exposing the identity of victims who report crime*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>	
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?								
<i>Institution Sector</i>				3.64	4	0.46	0.06	
Public	77 (29%)	141 (53%)	48 (18%)					
Private Not-for Profit	44 (30%)	78 (53%)	26 (18%)					
Private For-Profit	5 (14%)	22 (63%)	8 (23%)					
Total	126 (28%)	241 (54%)	82 (18%)					
<i>Institution Type</i>				14.3	4	2	< 0.01	0.17
4 year or more	109 (32%)	165 (49%)	62 (18%)					
2 year or less	17 (15%)	76 (67%)	20 (18%)					
Total	126 (28%)	241 (54%)	82 (18%)					
<i>Institution Size</i>				8.57	4	0.07	0.09	
4,999 or less	45 (22%)	114 (56%)	44 (22%)					
5,000 to 14,999	39 (32%)	66 (55%)	16 (13%)					
15,000 and greater	42 (34%)	61 (49%)	21 (17%)					
Total	126 (28%)	241 (54%)	81 (18%)					

Crosstabs were also completed regarding the potential for messages to cause victims of past crime to experience trauma to check whether responses varied by institution sector, type, or size (see Table 6.6). A significant differences was observed when comparing by institution type. Respondents at 4-year institutions were more likely to report the concern that messages may cause victims of past crime to experience trauma ( $\chi^2 = 23.42$ ,  $df = 2$ ,  $p$ -value



<0.01). The effect size of this difference was checked using Cramer's  $V$ , which was 0.22, a medium effect size according to Cohen's guidelines. This difference may also be due to the greater likelihood of on-campus social dynamics, but also because students at a 4-year university may more frequently access on-campus services such as counseling and health centers where they report experiences with trauma. That would tend to make this issue more known to CSAs working at those institutions versus 2-year institutions, whose student populations may spend less time on campus outside of class time and be less likely to seek those services on-campus.

Table 6.6

*Causing victims of past crime to experience trauma*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?							
<i>Institution Sector</i>				3.38	4	0.50	0.06
Public	80 (30%)	97 (36%)	89 (33%)				
Private Not-for Profit	37 (26%)	63 (44%)	44 (31%)				
Private For-Profit	7 (20%)	16 (46%)	12 (34%)				
Total	124 (28%)	176 (40%)	145 (33%)				
<i>Institution Type</i>				23.42	2	< 0.01	0.22
4 year or more	108 (33%)	111 (33%)	113 (34%)				
2 year or less	16 (14%)	65 (58%)	32 (28%)				
Total	214 (28%)	176 (40%)	145 (33%)				
<i>Institution Size</i>				12.14	4	0.02	0.11
4,999 or less	44 (22%)	92 (46%)	64 (32%)				
5,000 to 14,999	42 (35%)	45 (37%)	34 (28%)				
15,000 and greater	39 (32%)	37 (30%)	47 (38%)				
Total	125 (28%)	174 (39%)	145 (33%)				

The concern that Clery Act messages may be perceived as victim blaming is shaped by broader social constructions of victimhood, particularly female victims. Madriz (1997) provided a detailed discussion of historical studies by Mendelshon, Wolfgang, Amin, and Hindelang, et al. who framed and perpetuated the concept of victim-precipitated crime, and portrayed an image of women as responsible for their own victimization. As Mandriz (pg. 75) explained, from the constructions of images of women as victims “we learn, for example that women are easy targets of violence vulnerable, and in need of male protection, and that women should limit their behaviors and activities ‘so nothing bad will happen to them.’” Belief in an array of rape myths, such as the belief that women precipitate rape by how they dress or act, have persisted in American society and on college campuses for many decades (Schwartz, 1996; McMahon, 2010).

The concern that Clery Act messages may be perceived as victim blaming emerges directly from reactions to the content included in the messages that are sent. Timely warning messages often provide a narrative to describe the crime and the actions of those involved in a situation. Messages that convey that a victim behaved in ways that might have increased their own risk, or that the victim participated in an activity that implied consent for some form of interpersonal activity, can be viewed as victim blaming because they perpetuate rape myths. For instance, a message that says a female was drinking, socializing at a fraternity party, walking alone at night, or behaved in some other way that made herself vulnerable may imply that she was culpable in the crime.

Because this issue may vary across different contexts, crosstabs regarding the potential for messages to be perceived as victim blaming was completed to check whether responses varied by institution sector, type, or size (see Table 6.7). Significant differences

were observed when comparing by institution type and size. Respondents at 4-year institutions were more likely to report the concern that messages may be perceived as victim blaming ( $\chi^2 = 32.70$ ,  $df = 2$ ,  $p$ -value  $< 0.01$ ). The effect size of this difference was checked using Cramer's  $V$ , which was 0.27, a medium effect size, approaching large, according to Cohen's guidelines. Respondents at larger institutions, particularly those with enrollments of 15,000 or more were also more likely to report this concern ( $\chi^2 = 36.17$ ,  $df = 4$ ,  $p$ -value  $< 0.01$ ). The effect size of this difference was checked using Cramer's  $V$ , which was 0.20, a medium effect size, approaching large according to Cohen's guidelines.

This finding is similar to others indicating that harmful issues associated with Clery Act messages are more prevalent at 4-year and larger institutions. Again, this is likely to be due to increased time spent on campus as a result of the nature of campus activities on larger 4-year campuses. These include the existence of campus residential facilities, Greek life programs, athletic events, and more frequent structured social activities. It is also likely that CSAs working at these institutions are more aware of these issues being reported to them because larger 4-year institutions have more services utilized by students, such as counseling and health centers, through which these issues are reported to campus officials.

Table 6.7

*Messages that are perceived as victim blaming*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$x^2$	<i>df</i>	<i>p</i>	<i>V</i>
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?							
<i>Institution Sector</i>				8.72	4	0.07	0.09
Public	80 (30%)	122 (46%)	65 (24%)				
Private Not-for Profit	36 (25%)	76 (52%)	33 (23%)				
Private For-Profit	3 (9%)	23 (68%)	8 (24%)				
Total	119 (27%)	221 (50%)	106 (24%)				
<i>Institution Type</i>				32.70	2	< 0.01	0.27
4 year or more	110 (33%)	142 (43%)	81 (24%)				
2 year or less	9 (8%)	79 (70%)	25 (22%)				
Total	119 (27%)	221 (50%)	106 (24%)				
<i>Institution Size</i>				36.17	4	< 0.01	0.20
4,999 or less	33 (16%)	118 (58%)	51 (25%)				
5,000 to 14,999	34 (28%)	65 (54%)	22 (18%)				
15,000 and greater	52 (42%)	36 (29%)	35 (28%)				
Total	119 (27%)	219 (49%)	108 (24%)				

Crosstabs regarding the potential for messages to result in retaliation against those who report crime were completed to check whether responses varied by institution sector, type, or size (see Table 6.8). Significant differences were observed when comparing by institution type and size. Respondents at 4-year institutions were more likely to report the concern that messages may result in retaliation against those who report crime ( $x^2 = 6.64$ ,  $df = 2$ ,  $p$ -value = 0.03). The effect size of this difference was checked using Cramer's  $V$ , which was 0.12, a small effect size according to Cohen's guidelines. Respondents at larger institutions, particularly those with enrollments of 15,000 or more were also more likely to report this concern ( $x^2 = 10.81$ ,  $df = 4$ ,  $p$ -value = 0.03). The effect size of this difference was

checked using Cramer's  $V$ , which was 0.11, a small effect size according to Cohen's guidelines.

Table 6.8

*Retaliation against those who report crime*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?							
<i>Institution Sector</i>				2.96*	4	0.56	0.05
Public	34 (13%)	154 (58%)	77 (29%)				
Private Not-for Profit	17 (12%)	93 (63%)	37 (25%)				
Private For-Profit	2 (6%)	24 (71%)	8 (24%)				
Total	53 (12%)	271 (61%)	122 (27%)				
<i>Institution Type</i>				6.64	2	0.03	0.12
4 year or more	44 (13%)	190 (57%)	98 (30%)				
2 year or less	9 (8%)	81 (71%)	24 (21%)				
Total	53 (12%)	271 (61%)	122 (27%)				
<i>Institution Size</i>				10.81	4	0.03	0.11
4,999 or less	21 (10%)	131 (65%)	51 (25%)				
5,000 to 14,999	11 (9%)	79 (65%)	31 (26%)				
15,000 and greater	22 (18%)	59 (49%)	40 (33%)				
Total	54 (12%)	269 (60%)	122 (27%)				

\*Chi-square may be inaccurate. Expected frequency less than 5.

The American College Health Association (ACHA) has published a toolkit designed to aid campuses in addressing sexual and relationship violence using a trauma-informed approach (ACHA, 2018). According to the ACHA, trauma is often associated with crime victimization, including sexual and relationship violence. Trauma can result in a range of symptoms including intrusive thoughts, feelings, and body sensations, a feeling that one has

lost control, flashbacks, nightmares, and a general loss of the sense of safety. Also according to the ACHA, victim blaming is pervasive in media and culture. Victim blaming messages perpetuate rape myths that portray sexual violence only as violent, physical, and forced sex acts and these messages shift blame by focusing on the actions of victims as if they were responsible their own victimization. Belief in rape myths may bias the adjudication of sexual violence cases, and a similar effect would be applicable to the decision-making related to Clery Act messages in cases related to sex crimes, as well as the development of message content. Re-traumatization, victim blaming and retaliation are certainly not the intended outcomes of Clery Act messages, however, the finding that these problems are occurring substantiates what has appeared in media reports and in the literature previously.

The ACHA (pg. 34) made several recommendations several considerations for administrators writing Clery Act messages related to incidents of sexual violence, including listing only necessary details, giving intentional consideration to avoiding victim blaming statements, and being mindful that specific details could lead to enough information to reveal the identity of the victim.

Given the potential for Clery Act messages to have such significant impacts on victims, the adoption of the following practices may aid in avoiding these sorts of unintended harmful consequences:

- Whenever possible, alerting the victim that a timely warning message will be issued, and explaining the purpose and timing of the message.
- Providing immediate access to counseling supports.

- Coordination with Student Affairs and Title IX administrators to assure protective measures, such as housing relocation and no-contact directives, are in place when a message will be issued.

**Deterring prospective students from enrolling.** The Clery Act’s requirement to issue timely warning messages about incidents of crime comes with the potential for an inherent conflict of interest. While it may be in the public interest to distribute the messages, it may not always be in the institution’s interest because the negative perceptions that the messages may create could create an impression that the campus is not safe or damage an institution’s reputation. As a consequence, campus administrators, and senior leadership in particular, may be concerned that Clery Act messages will harm the institution’s potential to enroll prospective new students.

In response to an open-ended question about reasons why institutions may not issue Clery Act messages when they should, respondents made the following comments that indicate concern for their impact on institutional reputation and enrollment as a motivation:

- “It terrifies me that campus pr [sic] and senior administration don’t take the timely warning issues seriously. They place the ‘look’ of the institution above student safety.”
- “Bad promotion for school, concerns with campus security that may result in lack of new student enrollment.”
- “Institutional fear of reputation damage.”
- “Senior Administration doesn’t want the appearance of an unsafe campus. They don’t want to the campus community to ask questions.”

Crosstabs regarding the concern that about messages deterring prospective students from enrolling were completed to check whether responses varied by institution sector, type, or size (see Table 6.9). Significant differences were observed when comparing by institution

type and size. Respondents at 4-year institutions were more likely to report the concern that messages may deter prospective students from enrolling ( $\chi^2 = 9.13$ ,  $df = 2$ ,  $p$ -value = 0.01). The effect size of this difference was checked using Cramer's  $V$ , which was 0.14, small effect size according to Cohen's guidelines. Respondents at larger institutions, particularly those with enrollments of 15,000 or more were also more likely to report this concern ( $\chi^2 = 11.65$ ,  $df = 4$ ,  $p$ -value = 0.02). The effect size of this difference was checked using Cramer's  $V$ , which was 0.11, a small effect size according to Cohen's guidelines.

Table 6.9

*Deterring prospective students from enrolling*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?							
<i>Institution Sector</i>				6.03*	4	0.20	0.08
Public	41 (15%)	129 (49%)	95 (36%)				
Private Not-for Profit	19 (13%)	85 (58%)	42 (29%)				
Private For-Profit	2 (6%)	22 (63%)	11 (31%)				
Total	62 (14%)	236 (53%)	148 (33%)				
<i>Institution Type</i>				9.13	2	0.01	0.14
4 year or more	54 (16%)	164 (49%)	115 (35%)				
2 year or less	8 (7%)	72 (64%)	33 (29%)				
Total	62 (14%)	236 (53%)	148 (33%)				
<i>Institution Size</i>				11.65	4	0.02	0.11
4,999 or less	19 (9%)	121 (60%)	62 (31%)				
5,000 to 14,999	23 (19%)	61 (50%)	37 (31%)				
15,000 and greater	19 (16%)	54 (44%)	49 (40%)				
Total	61 (14%)	236 (53%)	148 (33%)				

\*Chi-square may be inaccurate. Expected frequency less than 5.



**Chilling effects on crime reporting.** The potential for Clery Act messages to expose the identity of those who report crime as well as the potential for messages to trigger retaliation are the sources of the secondary concern that Clery Act messages may have a chilling effect on crime reporting. As Burd (1992) reported, administrators have expressed concern that victims who believe that their report of a sex offense will trigger timely warning messages may not only decline reporting to law enforcement, but may also avoid seeking help through counseling and other resources due to fear of their identity being exposed via a timely warning. Also, as Heck (2016) noted, timely warning messages that are sent without follow-up information indicating the outcomes of cases may have the counter-productive effect of leading people to believe that perpetrators get away with crime. That belief would also create a disincentive to report crime.

Crosstabs regarding the concern that Clery Act messages may have chilling effects on crime reporting were completed to check whether responses varied by institution sector, type, or size (see Table 6.10). Significant differences were observed when comparing by institution type and size. Respondents at 4-year institutions were more likely to report the concern the concern that messages may have a chilling effect on crime report ( $\chi^2 = 18.56$   $df = 2$ ,  $p$ -value  $< 0.01$ ). The effect size of this difference was checked using Cramer's  $V$ , which was 0.20, small effect size, closely approaching medium, according to Cohen's guidelines. Respondents at larger institutions, particularly those with enrollments of 15,000 or more were also more likely to report this concern ( $\chi^2 = 24.00$ ,  $df = 4$ ,  $p$ -value  $< 0.01$ ). The effect size of this difference was checked using Cramer's  $V$ , which was 0.16, a medium effect size according to Cohen's guidelines. Similar to other items noted in this chapter, this finding that the concern that chilling effects on reporting crime is more prevalent among larger and 4-

year institutions is likely due to the distinct features of those campuses. These include increased volume of crime reports on larger campuses and the which more often include on campus housing facilities, student services, and where students spend more time on-campus in out-of-classroom activities.

Table 6.10

*Chilling effects on crime reporting*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b>Don't Know</b> <i>n (%)</i>	$\chi^2$	<i>df</i>	<i>p</i>	<i>V</i>
14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?							
<i>Institution Sector</i>				3.29*	4	0.51	0.06
Public	43 (16%)	146 (55%)	75 (28%)				
Private Not-for Profit	19 (13%)	88 (59%)	41 (28%)				
Private For-Profit	2 (6%)	22 (65%)	10 (29%)				
Total	64 (14%)	256 (57%)	126 (28%)				
<i>Institution Type</i>				18.56	2	< 0.01	0.20
4 year or more	59 18(%)	174 (52%)	101 (30%)				
2 year or less	5 (4%)	82 (73%)	25 (22%)				
Total	64 (14%)	256 (57%)	126 (28%)				
<i>Institution Size</i>				24.00	4	< 0.01	0.16
4,999 or less	19 (9%)	127 (63%)	56 (28%)				
5,0000 to 14,999	15 (13%)	78 (65%)	27 (23%)				
15,0000 and greater	30 (24%)	50 (41%)	43 (35%)				
Total	64 (14%)	255 (57%)	126 (28%)				

\*Chi-square may be inaccurate. Expected frequency less than 5.

**Chapter Summary**

While the data on effectiveness indicated that there are many important beneficial effects associated with Clery Act timely warning and emergency notification messages, there are also clearly unintended harmful effects as well. These effects were identified in the literature as anecdotal cases, mostly reported in media stories. They included misleading people to believe campuses are less safe than they actually are, reinforcing racial stereotypes, impacting crime victims, deterring prospective students from enrolling, and chilling effects on crime reporting. The data confirm that Campus Security Authorities perceive these to be sizeable concerns.

## CHAPTER 7: TRAINING

Research question three (R3) and its associated hypothesis (H-3), presented again in table 7.1, sought to explore the training that Campus Security Authorities receive related to the development of timely warning and emergency notification message content. This emerged from the hypothesis (H-2), confirmed by the data presented in chapter 6, that Clery Act messages cause unintended harms such as victim blaming, exposing victims' identity, triggering retaliation, re-traumatization of victims, reinforcement of racial stereotypes, provoking fear, misleading people about campus safety, and chilling effects on crime reporting.

The third hypothesis (H-3) proposed that a lack of adequate training is a likely contributor to explaining why Clery Act messages are sometimes flawed and why they lead to these unintended harms. Respondents were asked several questions to explore the type of training they received related to Clery Act timely warning and emergency notification messages. Figure 7.1 shows that 89% ( $n = 418$ ) indicated they had received formal training to develop their knowledge and skills related to the administration of Clery Act requirements.

Table 7.1

*Chapter 7 Research Question and Hypothesis*

<b>Research Question</b>		<b>Associated Hypothesis</b>	
RQ-3	Does current training adequately develop CSAs' knowledge and skills related to the writing of Clery Act message content?	H-3	Current training does not adequately develop CSAs' knowledge and skills related to writing Clery Act message content, which contributes to unintended harmful effects.

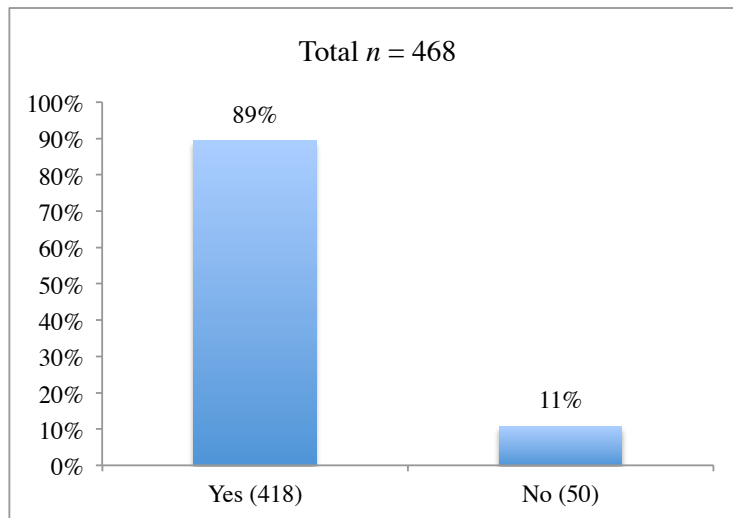


Figure 7.1. Have respondents received training?

Crosstabs of this item were completed to check whether the responses about training varied by institution sector, type, or size. Table 7.2 shows that a significant difference was observed when comparing respondents' participation in training by institution size ( $\chi^2 = 7.05$ ,  $df = 2$ ,  $p$ -value = 0.03). Those at larger institutions reported participating in training at a higher rate than those at smaller institutions. The effect size of this difference was checked using Cramer's  $V$ , which was 0.08, a small effect size, according to Cohen's (2008) guidelines. It is also important to note that those at for-profit institutions appear to be much less likely to receive this training relative to those at public and private not-for profit institutions. However, the chi-square results do not allow reliable reporting of the statistical significance of this observed difference.

Table 7.2

*Respondents' completion of training*

<b>Item</b>	<b>Yes</b> <i>n (%)</i>	<b>No</b> <i>n (%)</i>	<b><math>\chi^2</math></b>	<b><i>df</i></b>	<b><i>p</i></b>	<b>V</b>
16). Have you ever participated in any formal training programs to develop your knowledge and/or skills related to the administration of Clery Act requirements?						
<i>Institution Sector</i>			16.26*	2	0.00	0.13
Public	252 (92%)	23 (8%)				
Private Not-for Profit	135 (89%)	16 (11%)				
Private For-Profit	25 (69%)	11 (31%)				
Total	412 (89%)	49 (11%)				
<i>Institution Type</i>			3.08	1	0.08	0.08
4 year or more	311 (91%)	32 (9%)				
2 year or less	101 (85%)	18 (15%)				
Total	412 (89%)	49 (11%)				
<i>Institution Size</i>			7.05	2	0.03	0.08
4,999 or less	179 (85%)	31 (15%)				
5,000 to 14,999	115 (93%)	8 (7%)				
15,000 and greater	118 (92%)	10 (8%)				
Total	412 (89%)	49 (11%)				

\*Chi-square may be inaccurate. Expected frequency less than 5.

Respondents who answered that they had participated in formal training were asked two follow up questions about the format of the training they participated in and the subject matter that the training covered. Figure 7.2 shows respondents' answers regarding the format of the training in which they have participated. Figure 7.3 shows respondents' answers regarding the content of the training they have received.

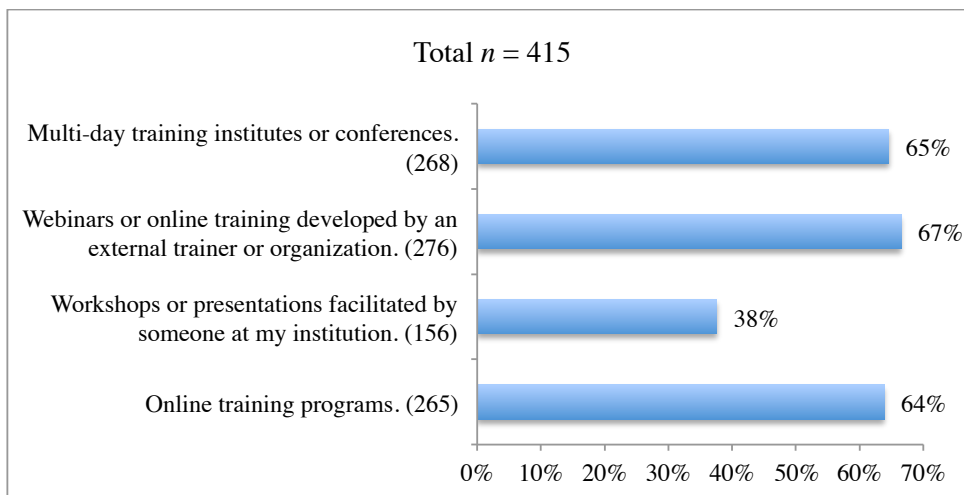


Figure 7.2. Format of training completed by respondents

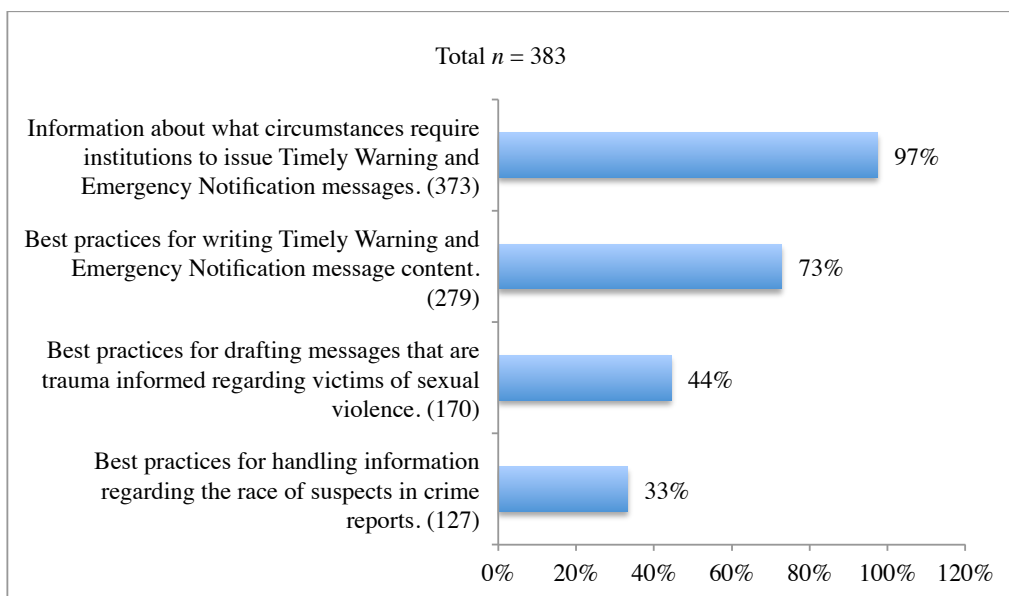


Figure 7.3. Content of training completed by respondents

The problems associated with timely warnings, including their implications related to race and impacts on victims of crime, emerge from the content that is included in timely warning messages, which are informed and shaped by the training that Clery Act administrators receive. These data provide good reason to conclude that current training in

the field does not adequately address the subject matter needed to develop the knowledge and skills to avoid these issues. When asked for detail about the content of the training (see Figure 7.3), only 33% ( $n = 127$ ) indicated that the training had included best practice information for handling information about the race of suspects in crime reports. Only 44% ( $n = 170$ ) indicated their training had included best practice information for drafting messages that were trauma-informed regarding victims of sexual violence.

Respondents were asked an open-ended follow-up question regarding ways that they believed that Clery Act training could be improved. Examples of comments that respondents made about the ways that training could be improved included:

- “At my institution notices and warnings often provoke students to demand more information about the details of the circumstance, details about the perpetrator and details about victims. I think increased training about how to craft the notices and how to explain to students that it is not appropriate to make some information public is important. Students seem to want all the details without realizing the risk or victimization this could cause to individuals involved. This is a delicate balance with providing limited information for safety purposes and activating students to demand what they see as their right to full disclosure.”
- “Creation of a universally accepted matrix that gives decision makers the proper tools to make an informed decision.”
- “[Private organization name redacted] provides the best Clery training, but it is expensive because it is a private company. I would like more free/low cost online or live webinar trainings”
- “Eliminate vague language in the manual”



- “Encourage people to draft templates for timely warnings [sic] related to sexual assault in conjunction with the counseling center on campus.”
- “It could give clear direction on when to issue the warning or notification instead of ambiguous criteria, but that would require clear directions from DOE [sic]”
- “More guidance on the prevention tips provided in warnings (I think everyone struggles with the balance between victim blaming while intending to be useful)”
- “More online training possibilities with little to no cost to campuses. More low to no cost training opportunities in the mid section of the United States. (Minnesota or Wisconsin). High costs and long travel and lodging can deter many smaller campuses from taking advantage of many [organization name redacted] sponsored training opportunities due to budget constraints.”
- “Trauma informed is always the best practice but those drafting the content are not always the ones with that type of training.”

Clery Act trainings tend to focus their attention on the technical requirements of compliance, such as the counting of Clery Act crimes for statistical purposes and the geographic areas institutions are required to include in their data. These data provide evidence that the timely warning and emergency notification provisions need to receive more attention, with specific focus on including information about handling sensitive issues such as reporting the race of suspects and construction of trauma-informed messages.

**Chapter Summary**

While most Campus Security Authorities reported completing training, including many who reported completing multi-day in-person workshops, it also indicated that there is a gap in the content that is delivered by training providers. Most respondents indicated they had not received training that addressed handling sensitive information about the race of suspects in crime reports or trauma-informed practices related to victims of crime. Given the data indicating the sizable number of unintended harms associated with Clery Act messages, skillsets around these topics are important and should be addressed in training developed in the future.

## CHAPTER 8: CONCLUSION AND IMPLICATIONS

This study sought to explore the perceptions of Campus Security Authorities to validate and measure not only whether the timely warning and emergency notification provisions of the Clery Act are working as intended — to improve campus safety by providing information to students, faculty and staff — but also whether they might be causing unintended harmful effects.

The literature demonstrated anecdotal evidence of harmful effects associated with Clery Act timely warning messages such as victim blaming, exposing the identity of victims who report crime, triggering retaliation, re-traumatizing victims of past crime, reinforcing racial stereotypes, and causing chilling effects on crime reporting. However, there had been very little research formally investigating whether Clery Act timely warning and emergency notification messages have the intended effects, or whether the anecdotal evidence of unintended harmful effects was merely incidental, or a sign of a sizeable problem. Also, no published research was identified that explored the type of training that Clery Act administrators receive or whether that training was sufficiently developing the knowledge and skills needed for Clery Act administrators to write Clery Act messages well.

Earlier studies had found that the statistical data included in annual security reports required by the Clery Act are not widely read by students or parents and did not seem to influence prospective students' choice of institution (Janosik, 2004; Janosik & Gehring, 2003). Conduct administrators and campus law enforcement also perceived those provisions of the law to have little impact on reducing crime or influencing students' safety-related behaviors (Janosik, & Gregory, 2003). In these ways, the Clery Act has not fulfilled its original intent.

In comparison, timely warning and emergency notification messages reach and influence more members of campus communities across the nation than the crime statistics. This study confirmed that Clery Act messages are perceived as an effective tool for improving campus safety, with 89% of respondents agreeing that they are helpful at informing recipients about safety issues (see Figure 5.4). Given their practical impact, timely warning and emergency notification messages are centrally important to fulfilling the intentions that the Clery's had for the legislation they worked so hard to see become a reality.

However, the study also confirmed that the messages result in unintended harmful effects, and it is important to acknowledge these in order to improve guidance and practice to reduce or mitigate unintended harms.

Campus crime and safety is a complex problem, and the Clery Act was designed to address that problem by creating a kind of system. This system is comprised of the various provisions of the Clery Act, each developed with the intent of addressing the overall issue of campus safety by increasing access to some kind of safety-related information. The premise of the law, and the system that it created, was that access to information would be a public good, enabling people to make informed choices that would improve their safety. However, the harms that have been occurring on connection with Clery Act messages are an unintended emergent property of that system.

Systems are often best understood through 'systems thinking.' Systems thinking is another way to say "Look at the complete picture" (Kashtri, 2014). It is different from most thinking that takes place in today's business and academic organizations, which use a reductionist approach, believing that problems can be reduced to a single specific root cause (such as lack of information) and solved by addressing that cause.

In contrast, systems thinking views problem solving through a ‘holistic’ lens. Ackoff (1971) described it this way:

“The systems approach to problems focuses on systems taken as a whole, not on their parts taken separately. Such an approach is concerned with total-system performance even when a change in only one or a few of its parts is contemplated because there are some properties that can only be treated adequately from a holistic point of view. These properties derive from the *relationships* between parts of systems: how the parts interact and fit together.”

The Clery Act may be flawed in that it attempts to address the complex problem of crime and campus safety using a reductionist approach, oversimplifying the problem to one of access to information without holistically accounting for the dynamics of how that information will impact the overall problem. Figure 8.1 provides a graphic that represents how the system created by the Clery Act operates. This illustrates how message creation is impacted by factors such as the training and experience of those who write the messages, as well as their perspectives and implicit biases. Also, the interpretation of messages is impacted by the social context and the ways the message is re-shared across social media, how media cover the message, attitudes and beliefs about crime, as well as implicit biases of those receiving the messages. This results in both intended outcomes as well as unintended harmful consequences when Clery Act messages are sent out.

Current federal guidance and administrative practices related to the Clery Act do not adequately account for these dynamics. The data in this study indicate that the simple solution of increasing access to information is not adequate to addressing the complexity of the problem. There is a need for greater attention to the quality of the content in Clery Act timely warning and emergency notification messages, how they are developed, and how they are interpreted by various segments of the campus population.

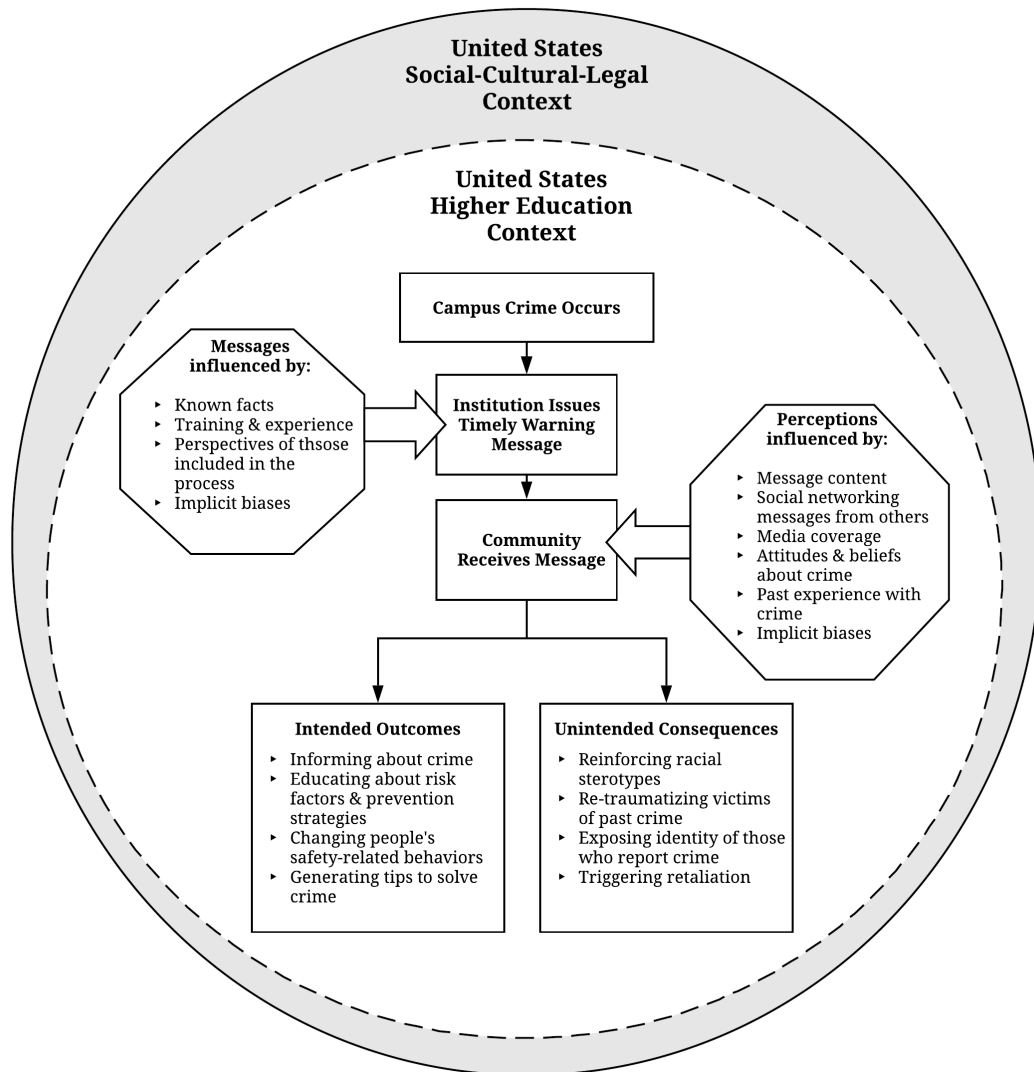


Figure 8.1. Clery Act message system diagram

### **Implications for Practice**

**Shifting attention from statistics to messages.** Given the limited impact of the publication of crime statistics and policies in annual security reports, as evidenced by past studies showing that they are not often read and do not impact prospective students' choice of institution (Janosik, 2004; Janosik & Gehring, 2003; Janosik, & Gregory, 2003), it would be beneficial for the field to shift its focus from the tabulation and publication of crime statistics to the development and improvement of effective timely warning and emergency notification messages.

**Improving guidance.** The guidance that the Department of Education has provided in *The Handbook for Campus Safety and Security Reporting* (U.S. Department of Education, 2016) is very minimal regarding the content that should be included in emergency notification and timely warning messages. It specifically says that “The Department’s Clery Act regulations do not specify what information has to be included in a timely warning” and continues by adding that “because the intent of the warning is to enable members of the campus community to protect themselves, the warning should include all information that would promote safety and that would aid in the prevention of similar crimes... You must include pertinent information about the crime that triggered the warning (pgs. 6-14-6 – 6-15).”

This is insufficient to avoid the problems that have been identified, particularly those related to racial stereotyping and impacts on victims of crime. Institutions need more information about what “*pertinent information*” to include as well as information that may be excluded to prevent unintended harmful consequences without triggering liability under Department of Education enforcement actions.

The field would benefit a great deal from better guidance in future versions of the Department of Education handbook. Guidance should address the handling sensitive matters, such as incidents that involve victims of sexual violence as well as the inclusion of race in suspect descriptions. Professional organizations and consultants who work in this field could assist this effort by developing recommendations and models for best practice around these issues as well as templates for the most common types of messages. These should then be included in future training programs to improve the skills of those who are responsible for developing these messages.

**Improving Training.** Clery Act trainings tend to focus their attention on the technical requirements of compliance, such as the counting of Clery Act crimes for statistical purposes and the geographic areas institutions are required to include in their data. The timely warning and emergency notification provisions need to receive more attention, with specific focus on handling sensitive issues such as reporting the race of suspects and constriction of trauma-informed messages to minimize harmful impacts on crime victims.

**Improving message content.** Finally, the quality of message content is the area in greatest need of attention and improvement in order to assure the intended outcomes of Clery Act messages while avoiding or mitigation the potential or unintended harmful consequences. Professional associations, consultants and those currently providing Clery Act training programs could have a significant impact on the quality of message content by developing message templates for the most common types of incidents that require Clery Act timely warning and emergency notification messages.



## REFERENCES

- 101st Cong. Rec. 1259, (1990) (remarks of Representative William Goodling).
- 105<sup>th</sup> Cong. Rec. S7784 (1998).
- 109th Cong. Rec. S37, (2006) (remarks of Senator Arlen Specter).
- AAUW – American Association of University Women (2015). *91 percent of colleges reported zero incidents of rape in 2014*. American Association of University Women. Retrieved from <https://www.aauw.org/article/clery-act-data-analysis/>
- ACHA – American College Health Association (2018). Addressing sexual and relationship violence: A trauma-informed approach. Retrieved from [https://www.acha.org/documents/resources/Addressing\\_Sexual\\_and\\_Relationship\\_Violence\\_A\\_Trauma\\_Informed\\_Approach.pdf](https://www.acha.org/documents/resources/Addressing_Sexual_and_Relationship_Violence_A_Trauma_Informed_Approach.pdf)
- Ackoff, R. L. (1971). Towards a system of systems concepts. *Management science*, 17(11), 661-671.
- Associated Press (2016, November). ‘Run, hide, fight’: Ohio State attack advice is new mantra on campuses. *NBC News*. Retrieved from <https://www.nbcnews.com/news/us-news/run-hide-fight-ohio-state-attack-advice-new-mantra-campus-n689341>
- Barlow, M. H. (1998). Race and the problem of crime in *Time* and *Newsweek* cover stories, 1946 to 1995. *Social Justice*, 25, 149-183.
- Baum, H. (2017) *Exploring student use of social networking services (SNS), surrounding moral development, gender campus crime, safety, & the Clery Act: A mixed methods study*. (Doctoral dissertation). ProQuest. (10623060).

- Bowen, E. A., and Shaanta-Murshid, N. (2016). Trauma-informed social policy: A conceptual framework for policy analysis and advocacy. *Journal of American Public Health*. 106(2). 223-229.
- Burd, S. (1992, July 22). U.S. proposes regulations on disclosure of graduation rates and campus crime data. *The Chronicle of Higher Education*. 38(46).
- Byers, C. (2017, June 17). VCU removes suspect descriptions from email crime alerts. *Campus Safety*. Retrieved from [https://www.campussafetymagazine.com/news/vcu\\_removes\\_suspect\\_descriptions\\_from\\_email\\_crime\\_alerts/](https://www.campussafetymagazine.com/news/vcu_removes_suspect_descriptions_from_email_crime_alerts/)
- Carter, S.D. (2019) Off-campus timely warnings – An explanation. Omnilert Blog. Retrieved from <https://www.omnilert.com/blog/off-campus-timely-warnings-an-explanation>
- Cohen, J. (1988). *Statistical power analysis for the behavioral sciences* (2nd ed.). Lawrence Erlbaum Associates: Hillsdale. *NJ, USA*.
- College and University Security Information Act of 1988, 24 Pa. Consol. Stat. § 2502:1-5 (1991).
- Creswell, J. W., & Creswell, J. D. (2018). *Research design: Qualitative, quantitative, and mixed methods approaches*. Sage publications.
- DeSantis, N. (2014, April). Virginia Tech paid \$32,500 in Clery Act penalties over response to shootings. *The Chronicle of Higher Education*. Retrieved from <https://www.chronicle.com/blogs/ticker/virginia-tech-paid-32500-in-clery-act-penalties-over-response-to-shootings/76035>

- Dillman, D. A., Smyth, J. D., & Christian, L. M. (2014). *Internet, phone, mail, and mixed-mode surveys: the tailored design method, 4<sup>th</sup> ed.* John Wiley & Sons.
- Doe v. University of the South*, 687 F. Supp. 2d 744 (E.D. Tenn. 2009).
- Gregory, D. E., & Janosik, S. M. (2003). The effect of the Clery Act on campus judicial practices. *Journal of College Student Development*, 44(6), 763-778.
- Greiss, L. (2016, Sept. 19). Timely but not always warnings: How timely warnings create awareness but also frustrations over sexual assault in Penn State community. *The Daily Collegian*. Retrieved from [http://www.collegian.psu.edu/features/article\\_6b78e200-7e14-11e6-805a-13958cac2635.html](http://www.collegian.psu.edu/features/article_6b78e200-7e14-11e6-805a-13958cac2635.html)
- Greenstein, N. S. (2002). Timely warnings: Alerting and protecting the campus community. Doctoral dissertation. Retrieved from ProQuest UMI Microform number 3058529.
- Griffaton, M. C. (1993). Forewarned is forearmed: The Crime Awareness and Campus Security Act of 1990 and the future of institutional liability for student victimization. *Case Western Reserve Law Review*. 43(2).
- Gross, K., & Fine, A. (1990, February 19). After their daughter is murdered, her grieving parents mount a crusade for campus safety. *People*, 33(7). Retrieved from <https://people.com/archive/after-their-daughter-is-murdered-at-college-her-grieving-parents-mount-a-crusade-for-campus-safety-vol-33-no-7/>
- Harshman, E., Puro, S., & Wolff, L. A. (2001). The Clery Act: Freedom of Information at what Cost to students?. *About Campus*, 6(3), 13-18.
- Hartley-Parkinson, R. (2016, November). Man pulled alarm and drove car into students as they evacuated before attacking with machete. *Metro*. Retrieved from

<http://metro.co.uk/2016/11/28/active-shooter-on-university-campus-as-students-are-told-run-hide-fight-6288144/>

*Havlik v. Johnson and Wales University*, 509 F.3d 25 (1st Cir. 2007).

Heath, L. (1984). Impact of newspaper crime reports on fear of crime. *Journal of Personality and Social Psychology*. 74(2) 263-276.

Heck, L. (2016). 'It shouldn't have to be this way:' A focus groups analysis of rape myths in Clery Act timely warnings. (Master's thesis). University of Missouri- Columbia. Columbia, MO.

Higher Education Act. Public Law 89-329.

Hoover, E. and Lipka, S. (2007, December). Colleges weigh when to alert students of danger. *The Chronicle of Higher education*. Retrieved from <http://chronicle.com/weekly/v54/i15/15a00101.htm>

*James v. Duquesne University*, 936 F. Supp. 2d 618 (W.D. Pa. 2013).

Janosik, S. M. (2004). Parents' views on the Clery Act and campus safety. *Journal of College Student Development*, 45(1), 43-56.

Janosik, S. M., & Gehring, D. D. (2003). The impact of the Clery Campus Crime Disclosure Act on student behavior. *Journal of College Student Development*, 44(1), 81-91.

Janosik, S. M., & Gregory, D. E. (2003). The Clery Act and its influence on campus law enforcement practices. *Naspa Journal*, 41(1), 182-199.

Jaschik, S. (2015, February 26). Race and crime alerts. *Inside HigherEd*. Retrieved from <https://www.insidehighered.com/news/2015/02/26/should-colleges-crime-alerts-include-reference-race-suspects>

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. Public Law 105-244.

Jouzaitis, C. (1990, December 2). Crime statistics at colleges still leave questions. *Chicago Tribune*. Retrieved from <https://www.chicagotribune.com/news/ct-xpm-1990-12-02-9004090741-story.html>

Kaminski, R. J., Koons-Witt, B. A., Stewart Thompson, N., and Weiss, D. (2010). The impacts of the Virginia Tech and Northern Illinois University shootings on fear of crime on campus. *Journal of Criminal Justice*. 38(1), 88-98.

King, M. and Bruner, G. 2000. Social desirability bias: a neglected aspect of validity testing. *Psychology and Marketing*, 17(2): 79–103.

Kshatri, J. (2014). *Systems thinking – the missing piece of the puzzle*. Retrieved from: <http://www.thinksmarterworld.com/systems-thinking-missing-puzzle/>

*Kleisch v. Cleveland State University*, No. 50AP-289, 2006 WL 701047 (Ohio Ct. App. 83 2006).

*Lewen v. Edinboro University of Pennsylvania*, 2011 WL 4527348 (W.D. Pa. Sept. 28, 2011).

Lombardi, K. (2009). *Campus sexual assault statistics don't add up*. Center for Public Integrity. Retrieved from <https://publicintegrity.org/education/campus-sexual-assault-statistics-dont-add-up/>

Malafrente, K. (2018). *University of Montana fined close to \$1 million for Clery Act violations*. Campus Safety. Retrieved from <https://www.campussafetymagazine.com/clery/university-of-montana-fined-close-to-1m-for-clery-act-violations/>

- Madriz, E. (1997). *Nothing bad happens to good girls: Fear of crime in women's lives*. Univ of California Press.
- Matthews, A. (1993, November 7). The campus crime wave. *The New York Times*. Retrieved from <https://www.nytimes.com/1993/03/07/magazine/the-campus-crime-wave.html>
- McMahon, S. (2010). Rape myth beliefs and bystander attitudes among incoming college students. *Journal of American college health*, 59(1), 3-11. Retrieved from <https://pdfs.semanticscholar.org/d2b9/19c8c3f54645be8c6fa3f6a776140efe4565.pdf>
- Nelson, V. (2008, January 13). Howard Clery Jr., 77; lobbied for increased campus security. *Boston Globe*. Retrieved from [http://archive.boston.com/bostonglobe/obituaries/articles/2008/01/13/howard\\_clery\\_jr\\_77\\_lobbied\\_for\\_increased\\_campus\\_security/](http://archive.boston.com/bostonglobe/obituaries/articles/2008/01/13/howard_clery_jr_77_lobbied_for_increased_campus_security/)
- Richardson, T. N. (2014). *A Legal Analysis of Court Cases and Administrative Investigations Related to Violations of the Clery Act: Getting Good from the Bad and the Ugly*. (Doctoral Dissertation). University of South Carolina Scholar Commons. Retrieved from [https://scholarcommons.sc.edu/cgi/viewcontent.cgi?referer=https://scholar.google.com/scholar?hl=en&as\\_sdt=0%2C31&q=A+LEGAL+ANALYSIS+OF+COURT+CASES+AND+ADMINISTRATIVE+INVESTIGATIONS+RELATED+TO+VIOLATIONS+OF+THE+CLERY+ACT%3A+GETTING+GOOD+FROM+THE+BAD+AND+THE+UGLY+by+Tiffany+Nichole+Richardson&btnG=&httpsredir=1&article=3975&context=etd](https://scholarcommons.sc.edu/cgi/viewcontent.cgi?referer=https://scholar.google.com/scholar?hl=en&as_sdt=0%2C31&q=A+LEGAL+ANALYSIS+OF+COURT+CASES+AND+ADMINISTRATIVE+INVESTIGATIONS+RELATED+TO+VIOLATIONS+OF+THE+CLERY+ACT%3A+GETTING+GOOD+FROM+THE+BAD+AND+THE+UGLY+by+Tiffany+Nichole+Richardson&btnG=&httpsredir=1&article=3975&context=etd)
- Schwartz, M. D., & Nogrady, C. A. (1996). Fraternity membership, rape myths, and sexual aggression on a college campus. *Violence Against Women*, 2(2), 148-162. Retrieved

from

[https://www.researchgate.net/profile/Martin\\_Schwartz/publication/11128121\\_Fraternity\\_Membership\\_Rape\\_Myths\\_and\\_Sexual\\_Aggression\\_on\\_a\\_College\\_Campus/links/56996de108ae6169e5518bf1/Fraternity-Membership-Rape-Myths-and-Sexual-Aggression-on-a-College-Campus.pdf](https://www.researchgate.net/profile/Martin_Schwartz/publication/11128121_Fraternity_Membership_Rape_Myths_and_Sexual_Aggression_on_a_College_Campus/links/56996de108ae6169e5518bf1/Fraternity-Membership-Rape-Myths-and-Sexual-Aggression-on-a-College-Campus.pdf)

Solomon, W. E. (1988, November 6). Pennsylvania to make schools disclose their crime figures. *The New York Times*. Retrieved from

<https://www.nytimes.com/1988/11/06/us/pennsylvania-to-make-schools-disclose-their-crime-figures.html>

Sorkin, F., Sullivan, L. L. P., & Freeh, L. J. (2012). *Report of the special investigative counsel regarding the actions of the Pennsylvania State University related to the child sexual abuse committed by Gerald A. Sandusky*. Freeh Sorkin & Sullivan, LLP.

Retrieved from <http://i2.cdn.turner.com/cnn/2012/images/07/12/freeh.report.pdf>

Szpaller, K. (2018, October). University of Montana fined nearly \$1 million for Clery Act violations; UM to appeal. *The Missoulian*. Retrieved from

[https://missoulian.com/news/local/university-of-montana-fined-nearly-million-for-clery-act-violations/article\\_219218a5-0bc5-5eea-8d55-6f5f962ddc00.html](https://missoulian.com/news/local/university-of-montana-fined-nearly-million-for-clery-act-violations/article_219218a5-0bc5-5eea-8d55-6f5f962ddc00.html)

The Higher Educational Amendments Act of 1989, Pub. L. No. 105-244, § 1001 (1990).

The Student Right-to-Know and Campus Security Act of 1990, Pub. L. No. 101-542, § 201 (1991).

Tyler-Richards, C. (2017, March 2). Crime warning emails perpetuate racism and negative stereotypes. *Daily Cardinal*. Retrieved from

<http://www.dailycardinal.com/article/2017/03/crime-warning-perpetuates-racism>

- U.S. Department of Education (2016). *U.S. Department of Education levies historic fine against Penn State over handling of sexual misconduct incidents.*
- U.S. Department of Education, Office of Postsecondary Education. (2016). *The Handbook for Campus Safety and Security Reporting (2016 Edition)*. Washington, D.C. Retrieved from <https://www2.ed.gov/admins/lead/safety/handbook.pdf>
- Violence Against Women Act; Final Rule (34 CFR part 668).
- Volkwein, J. F., Szelest, B. P., & Lizotte, A. J. (1995). The relationship of campus crime to campus and student characteristics. *Research in Higher Education*, 36(6), 647-670.
- Welch, K. (2007). Black criminal stereotypes and racial profiling. *Journal of Contemporary Criminal Justice*, 23(3), 276-288.
- Wheeler-Lea Act of 1938, Public Law 75-447 (1938).
- Zdziarski, E. L., Dunkel, N. W., & Rollo, J. M. (2007). *Campus crisis management: A comprehensive guide to planning, prevention, response, and recovery*. John Wiley & Sons.



## APPENDIX 1: QUESTIONNAIRE

0% Survey Completion 100%



Thank you for responding to this invitation to participate in research on Clery Act Timely Warnings and Emergency Notifications. Completing this questionnaire should take about 8 minutes. Your participation is completely voluntary and you may decline to participate or skip any question you do not feel comfortable answering. There are no expected risks or discomforts associated with choosing to respond to this questionnaire. Your responses will be kept confidential. No personally identifiable information about you or the institution you work for will be included in any reports based on this research. This research has been approved by the institutional review board at Thomas Jefferson University. If you have any questions about this research, you may contact the principal investigator, Travis Douglas at 856-256-4270.

If you would like to receive a report about the results or updates about future publications based on this research, you will be able to enter your contact information in a form linked at the end of the questionnaire. Please note that submission of that information is completely optional and will not impact the research.

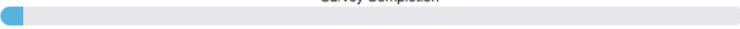
**By clicking the "I Agree" option below, you confirm that:**

- **You have read the above information**
- **You voluntarily agree to participate in this research**
- **You are at least 18 years of age**

I Agree

I Do Not Agree



0%  100% Survey Completion



1). What functional area(s) do you work in at your institution? Please check all that apply.

Campus Law Enforcement/Security

Clery Act Compliance

Title IX Administration

Residence Life/Housing

Dean of Students Office

Student Conduct/Community Standards

Health Education/Promotions

Counseling/Psychological Services

University Relations/Public Relations

Legal Counsel

Sr. Administration

Other/Not Listed



0%  Survey Completion 100%



2). In your current position, are you responsible for any of the following activities related to Clery Act compliance? Please check all that apply:

Reporting crimes as a "Campus Security Authority."

Making the decision to issue Timely Warning and Emergency Notification messages.

Writing the content of Timely Warning and Emergency Notification messages.

Approving the decision to issue Timely Warning or Emergency Notification Messages.

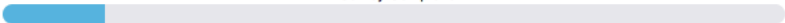
Advising other decision makers on the need to issue Timely Warning or Emergency Notification messages.

Assessment related to effectiveness of Clery Act compliance activities.

I am the principal officer/employee responsible for Clery Act compliance at my institution.

None of these apply to me.



0%  100%



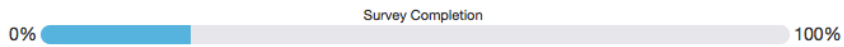
3). What types of crimes have led your institution to issue Clery Act Timely Warning messages?  
Note, the crimes listed are those defined by the Clery Act as reportable in the institutions' Annual Security Report. Please check all that apply.

Murder/Non-Negligent Manslaughter	Arson
Manslaughter by Negligence	Weapons Law Violations
Rape	Drug Law Violations
Fondling	Liquor Law Violations
Incest	Hate Crimes
Statutory Rape	Dating Violence
Robbery	Domestic Violence
Burglary	Stalking
Motor Vehicle Theft	Other/Not Listed
Aggravated Assault	





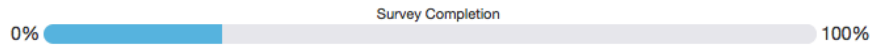
What other types of crimes have led your institution to issue Clery Act Emergency Notifications?



4). What types of emergencies have led your institution to issue Clery Act Emergency Notifications? Please check all that apply.

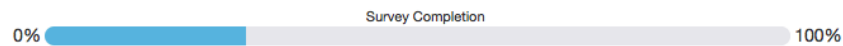
Severe Weather	Bomb Threat
Earthquake	Dangerous Persons
Fires	Active Shooter
Utility Failures	Dangerous Situations Near or Off Campus
Chemical or Biological Hazards	Other Emergencies





What other types of emergencies have led your institution to issue Clery Act Emergency Notifications?





5). Do you believe that Clery Act Emergency Notifications and Timely Warning messages issued at your institution help to inform people about safety issues?

Yes

No

Don't Know

6). Do you believe that Clery Act Emergency Notifications and Timely Warning messages issued at your institution influence people to make immediate (short-term) changes to the ways that they protect themselves?

Yes

No

Don't Know

7). Do you believe that Clery Act Emergency Notifications and Timely Warning messages issued at your institution influence people to make lasting (long-term) changes to the ways that they protect themselves?

Yes

No

Don't Know

8). Has a Clery Act Timely Warning messages issued at your institution ever resulted in information or tips being reported that assisted in solving a crime?

Yes

No

Don't Know

9). Do you believe that Clery Act Timely Warnings issued at your institution have been helpful at deterring or preventing crime?

Yes

No

Don't Know

10). How effective do you believe the following methods of distribution of Clery Act Emergency Notifications and Timely Warning messages are?

	Not at all Effective	Slightly Ineffective	Moderately Effective	Very Effective	Extremely Effective
Email	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Text Messages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Robo-calling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Television Alerts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Computer Monitor Alerts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Website	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Campus App	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



11). Overall, how effective do you believe Clery Act Emergency Notifications and Timely Warning messages issued at your institution are as a tool for improving campus safety?

Not at all Effective

Slightly Effective

Moderately Effective

Very Effective

Extremely Effective





12). At your institution, are any of following functional area(s) involved in developing the content of Clery Act Emergency Notifications and Timely Warning messages at least sometimes?

	Yes	No
Campus Law Enforcement/Security	<input type="radio"/>	<input type="radio"/>
Clery Act Compliance	<input type="radio"/>	<input type="radio"/>
Title IX Administration	<input type="radio"/>	<input type="radio"/>
Residence Life/Housing	<input type="radio"/>	<input type="radio"/>
Dean of Students Office	<input type="radio"/>	<input type="radio"/>
Student Conduct/Community Standards	<input type="radio"/>	<input type="radio"/>
Health Education/Promotions	<input type="radio"/>	<input type="radio"/>
Counseling/Psychological Services	<input type="radio"/>	<input type="radio"/>
University Relations/Public Relations	<input type="radio"/>	<input type="radio"/>
Legal Counsel	<input type="radio"/>	<input type="radio"/>
Sr. Administration	<input type="radio"/>	<input type="radio"/>
Other/Not Listed	<input type="radio"/>	<input type="radio"/>

13). Has your institution ever assessed the perceptions of Clery Act Emergency Notifications and Timely Warning messages issued at your institution?

Yes
No
Don't Know

14). Has anyone ever expressed concern that Clery Act Timely Warning messages at your institution could result in the following types of problems?

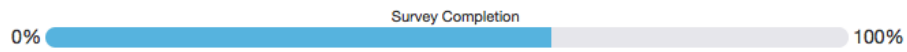
	Yes	No	Don't Know
Messages that are perceived as victim blaming	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exposing the identity of victims who report crime	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Causing victims of past crime to experience trauma	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforcement of racial stereotypes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Retaliation against those who report crime	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Chilling effects on crime reporting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Misleading people to believe the campus is less safe than it actually is	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Deterring reporting of crime	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Deterring prospective students from enrolling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provoking a panic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15). Do you believe there are ever situations when Clery Act Emergency Notifications and Timely Warning messages are NOT issued at your institution when they should be?

Yes

No





Can you provide any examples of the types of situations when notifications were not issued when they should have been (please do not identify your institution or any personally identifiable information about anyone involved in the situation)?

What do you believe are the reasons why messages are not issued when they should be?






16). Have you ever participated in any formal training programs to develop your knowledge and/or skills related to the administration of Clery act requirements?

Yes

No



Survey Completion

0%  100%

16a). Which of the following best describes the training that you received? Please check all that apply.

 Online training program(s) Workshops or presentations facilitated by someone at my institution Webinars or online training developed by an external trainer or organization Multi-day training institutes or conferences

16b). Have any formal training programs you participated in covered the following subject matter? Please check all that apply.

 Information about what circumstances require institutions to issue Timely Warning and Emergency Notification messages. Best practices for writing Timely Warning and Emergency Notification message content. Best practices for drafting messages that are trauma informed regarding victims of sexual violence. Best practices for handling information regarding the race of suspects in crime reports.

16c). Do you have any recommendations about ways that Clery Act training could be improved in the future?



Survey Completion

0%

100%



17). Which of the following best describes the type of institution where you currently work?

Public Higher Education InstitutionPublic, 4-year or above

Public, 2-year

Public, less-than 2-year

Private nonprofit, 4-year or above

Private nonprofit, 2-year

Private nonprofit, less-than 2-year

Private for-profit, 4-year or above

Private for-profit, 2-year

Private for-profit, less-than 2-year

18). What is the approximate total enrollment of your institution?

Less than 500

Between 500 and 999

Between 1,000 and 1,499

Between 1,500 and 1,999

Between 2,000 and 2,999

Between 3,000 and 4,999

Between 5,000 and 9,999

Between 10,000 and 14,999

Between 15,000 and 19,999

Between 20,000 and 29,999

30,000 and greater

19). Which of the following types of environments best describes the primary campus or location of your institution?

Urban

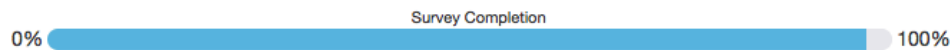
Suburban

Rural

Online



20). Is there anything else that you would like to share about the subject of Clery Act Emergency Notifications and Timely Warning messages that you believe is relevant to this research?



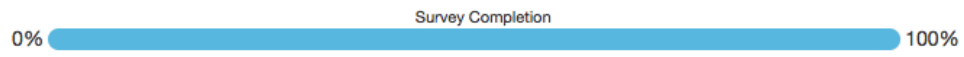
Thank you for completing the questionnaire. The results of this research will take some time to analyze and may result in future scholarly publications. If you would like to receive a report on the results of this research or updates about any future publication of this research when they become available, please visit the link below to be taken to a separate form to provide your contact information.

Please note that this list will be used only to share information about the specific research you contributed to. Your information will not be sold or added to a mailing list for marketing purposes of any kind. Also, this form is completely separate from the previous questionnaire. Your personally identifiable contact information cannot be linked to your answers to the research questionnaire.

Please copy and paste the link below into your browser:

[https://jefferson.co1.qualtrics.com/jfe/form/SV\\_8CSOjrpSsE9K0U](https://jefferson.co1.qualtrics.com/jfe/form/SV_8CSOjrpSsE9K0U)





We thank you for your time spent taking this survey.  
Your response has been recorded.

## APPENDIX 2: DISTRIBUTION EMAILS

### Initial invitation email:

Dear {m://FirstName},

I am contacting you to ask for your help with research about the effectiveness of Clery Act Emergency Notifications and Timely Warnings. Because of your work related to Clery Act compliance, you have knowledge and experience that is very relevant to this research.

You may work in police, security, student affairs or another field, but regardless of your role, please know that your perspective is important to this study. This is a national study and you have been specifically selected as part of a random sample of professionals who work on Clery Act compliance, which means that your response is very important to the success of this research effort.

I received your name and contact information from the [Clery Center](#), which has agreed to permit the use of their contact list for purposes of this research. The research is also made possible in part through the [Arlen Specter Center for Public Service Research Fellowship](#) at Thomas Jefferson University in Philadelphia.

It should take about 8 minutes to complete the questionnaire. Of course, your participation is completely voluntary. You may choose not to respond if you do not wish to. Your responses will be confidential. No personally identifiable information about you or the institution you work for will be included in any reports based on this research. There are no expected risks or discomforts associated with choosing to respond to this questionnaire. Your response will help to support this research and may help to improve training and professional practices related to Clery Act compliance.

This research has been approved by the Institutional Review Board at Thomas Jefferson University.

### **Please click the link below in order to complete the questionnaire:**

Survey Link

Or copy and paste the URL below into your internet browser:

Survey Link

If you have any questions about the questionnaire or my research, please feel free to contact me at [REDACTED] or by reply to this email.

Thank you!

Travis Douglas

Doctoral Candidate  
Thomas Jefferson University  
2018 Arlen Specter Center Research Fellow

**First follow-up reminder email:**

Dear {m://FirstName},

Last week I sent you a message asking for your response to a brief online questionnaire about Clery Act Emergency Notifications and Timely Warnings. I am following up in the hopes that you will complete the questionnaire so that your responses can be included in the data.

As I indicated, you were selected as part of a random sample from a list provided by the Clery Center. Because your name was selected as part of a random sample, your individual responses are important to the validity of the overall research. Only professionals like you can provide the data that is needed for this research, so I hope that you will be able to find a few minutes to respond to the questionnaire.

I know that your time is very valuable and I appreciate your consideration. I am providing the link again below in the hopes that this will make it as convenient as possible for you to respond.

**You can respond by clicking on the link below:**

Survey Link

Or copy and paste the URL below into your internet browser:

Survey Link

If you have any questions about the questionnaire or my research, please feel free to contact me at [REDACTED] or by reply to this email.

Thank you!

Travis Douglas  
Thomas Jefferson University  
2018 Arlen Specter Center Research Fellow  
Doctoral Candidate

**Second follow-up reminder email:**

Dear {m://FirstName},

Over the last two weeks, I sent you messages asking you to complete a questionnaire to support research on the effectiveness of Clery Act Timely Warnings and Emergency Notifications. I am sure you have been very busy and your time is very valuable. It should take no more than 10 minutes to respond, and your contribution to the research would be greatly appreciated. If you partially completed the questionnaire, completion of the remaining items would be very helpful.

Having data from professionals such as yourself who have direct experience working with Clery Act compliance is important to understanding the real world effectiveness of the Clery Act. Please know that even if you are not your institution's primary Clery compliance officer, your perspective is important to this research.

I received your name and contact information from [The Clery Center](#), which has agreed to permit the use of their contact list for purposes of this research. The research is also made possible in part through the [Arlen Specter Center for Public Service Research Fellowship](#) at [Thomas Jefferson University](#).

Of course, your response is voluntary, and you can respond by clicking on the link below:  
Survey Link

Or copy and paste the URL below into your internet browser:  
Survey Link

If you have any questions about the questionnaire or my research, please feel free to contact me at [REDACTED] or by reply to this email.

Thank you!

Travis Douglas  
Doctoral Candidate  
Thomas Jefferson University  
2018 Arlen Specter Center Research Fellow

**Final reminder email:**

Hello {m://FirstName},

I am sending one last follow up to the messages sent recently asking you to complete an online questionnaire about Clery Act Emergency Notifications and Timely Warnings. The research is drawing to a close, and your contribution to the research would be greatly appreciated.

I know that your time is very valuable and you may not have had time yet to complete the questionnaire. The questionnaire only takes about 10 minutes to complete and you can do it on your desktop, cell phone or a tablet if that is more convenient. As I indicated, you were selected as part of a random sample from a list provided by the [Clery Center](#). Because your name was selected as part of a national random sample, your individual responses are important to the validity of the overall research.

The website to collect data will be available until this Saturday, March 16<sup>th</sup>, 2019. I wanted to encourage you to respond so that your experiences and opinions can be included in this national study of the Clery Act.

The URL to provide your response is below. Simply click on the link visit the online website and enter your responses:

Survey Link

Or copy and paste the URL below into your internet browser:

Survey Link

Thank you for your time and consideration!

Thank you!

Travis Douglas  
Doctoral Candidate  
Thomas Jefferson University  
2018 Arlen Specter Center Research Fellow

### APPENDIX 3: IRB DOCUMENTATION

PI:  
Page 1 of 2

OHR-34  
Version Date: MM/DD/YYYY  
Version Number: X.X

#### JEFFERSON—Office of Human Research

#### Research Not Requiring IRB Review: A Checklist Version Date – FOR OHR USE: 11/1/18

STUDY TITLE: Efficacy of Clergy Act Timely Warnings and Emergency Notifications

PRINCIPAL INVESTIGATOR: Travis Douglas

TELEPHONE #: [REDACTED] E-MAIL: Travis.Douglas@jefferson.edu

**Instructions:** Use this form as a checklist to certify that the research you intend to conduct fits completely into one or more of the following categories. These categories do not meet federal definitions of human subjects research as cited in HHS and FDA regulations at 45 CFR 46.102 & 21 CFR 50.3, respectively, and, therefore, do not fall under IRB purview and do not require IRB review.


Please check the applicable categories of research you intend to conduct:

- \_\_\_\_\_ (1) Scholarly and journalistic activities (e.g., oral history, journalism, biography, literary criticism, legal research, and historical scholarship), including the collection and use of information, that focus directly on the specific individuals about whom the information is collected.
- \_\_\_\_\_ (2) Public health surveillance activities, including the collection and testing of information or biospecimens, conducted, supported, requested, ordered, required, or authorized by a public health authority. Such activities are limited to those necessary to allow a public health authority to identify, monitor, assess, or investigate potential public health signals, onsets of disease outbreaks, or conditions of public health importance (including trends, signals, risk factors, patterns in diseases, or increases in injuries from using consumer products). Such activities include those associated with providing timely situational awareness and priority-setting during the course of an event or crisis that threatens public health (including natural or man-made disasters).
- \_\_\_\_\_ (3) Quality assurance or quality improvement projects in which the data collected will be used only to verify, alter or improve quality of care or efficiency within the Jefferson entity. (If external publication or public presentation of data is intended, project may require IRB review. Please consult with Office of Human Research)
- X (4) Information-gathering interviews, questionnaires & surveys where questions focus on factual information and opinions about processes, services, or policies, and do not gather personal information about living individuals, or; research gathering factual information from source texts.
- \_\_\_\_\_ (5) Research involving cadavers, autopsy materials or bio-specimens from deceased individuals. (Note: HIPAA does not exempt decedent research, and so this research requires review by the Privacy Officer. Please complete form OHR-17 and submit to the Legal Department.)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51

- 52 \_\_\_\_\_ (6) Coded private information or biological specimens that were not collected for  
53 the currently proposed research and for which the investigator cannot link the  
54 coded data/specimens back to individual subjects. (Note: This research requires  
55 that you submit OHR-19 form to the Office of Human Research.)  
56
- 57 X (7) Research that does not involve collection of private information about living  
58 individuals. (This category excludes observation of public behavior, which is  
59 considered a category 2 exemption, for which you should submit OHR-18 to the  
60 IRB.)  
61
- 62 \_\_\_\_\_ (8) Research where Jefferson is not engaged in the research. Examples of this  
63 include: when Jefferson's employees or agents 1) act as consultants or provide  
64 paid service for research but at no time obtain, receive, or possess identifiable  
65 private information, or 2) inform prospective subjects about the availability of  
66 research. (Note: this is not a complete list of examples.)  
67
- 68 \_\_\_\_\_ (9) Case reports of one or two cases. (Three or more case reports in one series  
69 require IRB review). While one or two case reports do not require IRB review,  
70 they do require review by the Privacy Office.  
71

72 \_\_\_\_\_  
73  
74 **By signing below, the Principal Investigator certifies that the entirety of his/her**  
75 **research fits into one or more of the above categories.**

76  
77  \_\_\_\_\_  
78 1/29/19  
79 Principal Investigator Date

80  
81  
82 **WRITTEN DETERMINATIONS**

83  
84 If a determination is required by a funding agency or sponsor, the investigator may  
85 submit a request for written confirmation along with the OHR-34 to the IRB, which will  
86 provide a written response.



APPENDIX 4: FUNCTIONAL AREA OVERLAP

	Campus Law Enforcement/Security	Clergy Act Compliance	Title IX Administration	Residence Life/Housing	Dean of Students Office	Student Conduct/Community Standards	Health Education/Promotions	Counseling/Psychological Services	University Relations/Public Relations	Legal Counsel	St. Administration	Other/Not Listed
Campus Law Enforcement/Security	288 100%	153 53%	36 13%	10 3%	11 4%	19 7%	3 1%	1 0%	1 0%	1 0%	18 6%	10 3%
Clergy Act Compliance	153 58%	265 100%	85 32%	13 5%	34 13%	46 17%	7 3%	7 2%	6 2%	6 2%	47 18%	34 13%
Title IX Administration	36 23%	85 54%	158 100%	9 6%	36 23%	39 25%	7 4%	6 4%	6 4%	2 1%	38 24%	23 15%
Residence Life/Housing	10 33%	13 43%	9 30%	30 100%	10 33%	15 50%	5 17%	5 10%	3 10%	3 10%	0 0%	6 20%
Dean of Students Office	11 16%	34 79%	36 51%	10 14%	70 100%	35 50%	6 9%	6 10%	7 10%	2 3%	1 1%	19 7%
Student Conduct/Community Standards	19 25%	46 60%	39 51%	15 19%	35 45%	77 100%	8 10%	9 12%	9 12%	2 3%	1 1%	18 23%
Health Education/Promotions	3 12%	7 27%	7 27%	5 19%	6 23%	8 31%	26 100%	8 31%	8 31%	1 4%	0 0%	3 12%
Counseling/Psychological Services	1 4%	6 24%	6 24%	3 12%	7 28%	9 36%	8 32%	8 100%	25 100%	0 0%	0 0%	4 13%
University Relations/Public Relations	1 9%	6 55%	2 18%	1 9%	2 18%	2 18%	1 9%	0 0%	11 100%	0 0%	0 0%	4 9%
Legal Counsel	1 17%	4 67%	1 17%	0 0%	1 17%	1 17%	0 0%	0 0%	0 0%	6 100%	2 33%	0 0%
St. Administration	18 20%	47 51%	38 41%	6 7%	19 21%	18 20%	3 3%	4 4%	4 4%	4 2%	92 100%	5 5%
Other/Not Listed	10 8%	34 26%	23 18%	4 3%	5 4%	5 4%	3 2%	1 1%	1 1%	0 0%	5 4%	129 100%
Total	288	265	158	30	70	77	25	25	11	6	92	129