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A Case Study: Clery Act Policy and Implementation Strategies

Sara Beverage

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Concordia University–Portland

College of Education

Doctor of Education Program

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A Case Study: Clery Act Policy and Implementation Strategies

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Concordia University–Portland

College of Education

Dissertation submitted to the Faculty of the College of Education

in partial fulfillment of the requirements for the degree of

Doctor of Education in

Higher Education

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Concordia University–Portland

2019

Abstract

The Clery Act was created as a consumer protection law to inform prospective students and their families about the safety of the campuses they consider. The law requires that post–secondary institutions participating in Title IV federal financial assistance programs remain compliant with Clery Act regulations to maintain the ability to offer financial aid funds to students.

Noncompliance with the Clery Act can result in disqualification from Title IV programming and damaging institutional fines. These consequences warrant a deeper examination of the law and ways that Clery Act facilitators effectively implement compliance strategies and affect campus safety. This intrinsic case study examined how higher education administrators at a multicampus public university implement strategies to facilitate Clery Act compliance. Participants in this study were individuals employed at a multicampus institution located in the upper Midwest; 24 people were invited, and nine agreed to participate. Participants in this study included Clery officials, Title IX coordinators, and campus security authorities. Data was collected via interview, and then triangulated with artifacts and observational notes. The results of this study determined that at the site institution participants worked collaboratively between campuses and with outside stakeholders to remain in compliance with Clery Act requirements. Additional findings demonstrated that innovative approaches were being employed to improve compliance strategies and heighten campus safety efforts. Participants’ rich descriptions and narratives also evinced unanticipated findings that can serve as a springboard for future research and points of discussion to further conversations regarding campus safety and the mitigation of campus violence.

Keywords: Clery Act, campus safety, campus security, financial aid, Jeanne Clery
Disclosure of Campus Security Policy and Campus Crime Statistics Act, Violence Against
Women Act, Campus SaVE Act, Higher Education Act, Title IX, Title IV

Dedication

This research is dedicated to Jeanne Clery and to the victim advocates and security officials who work so diligently to keep our campus communities safe.

Acknowledgments

No human lives in a vacuum. We exist in interconnected webs of support that strengthen who we are and what we do. On bended knee, I thank my mother and father for raising me in the academic life. Without you I would not be where I am today. Together you instilled in me your passion for learning. I love you both with all my heart. To my three sons: Thank you for your patience and love while I completed this amazing journey.

For William: When I could no longer run, I walked; when I could no longer walk, I crawled; when I could no longer crawl, you picked me up and carried me. William Todd Rose, you are the love of my life and the only reason I was able to reach this finish line. You were there each step with me and so often you lifted me up and made sure I achieved every deadline and milestone of this odyssey. There were points when we were both weary, but you kept us going. WTR, your love and support doused every dissertation fire. Thank you for the best years of my life! We were weary, but now we rest.

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Chapter 1: Introduction

The Clery Act was created as the result of a tragic campus incident that occurred in 1986 (Doss et al., 2017). On April 5th of 1986, Jeanne Clery was tortured, raped, and strangled to death in her dorm room at Lehigh University in Bethlehem, Pennsylvania (Associated Press, 1986; Peterson, 2011). The assailant entered Jeanne's dorm via a series of secured doors that had been propped open by other dorm residents (Peterson, 2011). In response to her murder, Jeanne Clery's parents began a crusade to raise public awareness about campus crime and violence. Using money gained from their lawsuit against Lehigh University, Jeanne Clery's parents established a nonprofit 501(c)(3) organization known as *The Clery Center for Security on Campus* (Clery Center, 2018), and lobbied Congress to create stricter campus safety laws. Jeanne's parents stridently advocated for the rights of victims of campus violence and crime (Gardner, 2015), and their work is hailed as a transformational change in education (Clery Center, 2018).

Problem Statement

This study explored how higher education administrators implement strategies to facilitate Clery Act compliance. Previous Clery Act researchers noted that there is scarce academic research published on the strategies that institutional administrators use to implement Clery Act policy (Wood & Janosik, 2012), and the literature review corroborated this fact (Gardella et al., 2014; Gregory & Janosik, 2012). This gap in knowledge is problematic because of the importance of the Clery Act and the necessity to understand how higher education administrators perceive their roles and implement Clery Act policy to maintain institutional compliance. Documentation of effective policy implementation strategies can guide other facilitators as they strive to navigate policy process. Thus, further research in this area is crucial

to discern the strategies that policy facilitators are employing to reduce fines and maintain compliance. Knowledge in this area can guide and improve Clery Act policy implementation, and prompt growth in the development of new campus crime prevention techniques.

Issues regarding the Clery Act include its detailed policy language and the lack of specific guidance on strategies that institutional administrators should use to implement compliance strategies (Gregory et al., 2016; McNeal, 2007). The Clery Act's regulations are extensive, and compliance requires collaboration among many campus departments. Clery Act compliance is monitored by the United States Department of Education (DOE); however, while the DOE dictates compliance outcomes, it does not necessarily provide guidance on how institutional administrators can achieve these results (Gregory et al., 2016; McNeal, 2007; Wood & Janosik, 2012; Woodward, Pelletier, Griffin, & Harrington, 2016). This one fact is extremely significant because institutions participating in federal financial assistance programs must decide how to best implement policy requirements such as timely emergency alerts, providing training programs to raise campus awareness on issues such as dating violence, domestic violence, hate crimes, sexual assault, and stalking, and the publication of daily crime logs and Annual Security Reports (U.S. Department of Education, 2016).

For example, one Clery Act requirement mandates that timely campus safety alerts must be issued during emergencies. However, the law does not specify what type of notification system institutional administrators should use. Instead, policy language recommends that each institution determine the most appropriate mode of communication for their campus community (Woodward et al., 2016). Emergency notification systems are also dependent on the type of emergency and situation; fire alarms may be appropriate in some instances, while email or text notification may be more appropriate at other times. The U.S. Department of Education (2016)

encourages institutions to maintain overlapping modes of communication in case one method fails. The discretionary nature of institutional Clery Act compliance demands an in-depth examination of strategies available to facilitators to implement the policy's requirements.

This single-institution, intrinsic case study was designed to explore implementation practices that will be meaningful to similar schools and will serve as a basis for nonsimilar institutions to examine their compliance strategies. Although it is understood that a case study may not be generalizable, it captures and documents a phenomenon and potentially guides further research. Case study research sparks discussions, and such conversations can improve Clery Act compliance and strategy implementation.

Background, Context, and History

The Clery Act is composed of a set of federal regulations created to promote consumer awareness while students and their families review potential universities, and to mitigate violence for individuals on the campus of their choice. First enacted as the *Crime Awareness and Campus Security Act of 1990* (Title II of Public Law 101-542), the act was renamed the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* in 1998 (20 U.S.C. § 1092(f)). The Clery Act was updated through amendments and recodifications to include clauses that addressed hate crimes, sexual harassment, stalking, and emergency response procedures (Gregory et al., 2016; McCallion, 2014; Woodward et al., 2016). According to the U.S. Department of Education's (2016) *Handbook for Campus Safety and Security Reporting*, the Clery Act amended the *Higher Education Act of 1965* (Pub. L. No. 89-329) and has been updated numerous times.

The *Violence Against Women Reauthorization Act of 2013* (VAWA) amended the *Violence Against Women Act of 1994*. Also, in 2013, the *Campus Sexual Violence Elimination*

Act (H.R. 2016) was passed (Marshall, 2014). Commonly referred to as the SaVE Act (Marshall, 2014; Voth Schrag, 2017), this bill was codified to provide additional requirements that specifically addressed dating and domestic violence, sexual assault, and updated hate crime reporting (McCallion, 2014).

One key point is that the Clery Act requires all postsecondary institutions participating in Title IV financial assistance programs to comply with specific campus safety regulations (U.S. Department of Education, 2016; Wood & Janosik, 2012). These mandates include reporting campus crime and fire statistics via a publicly available daily crime log and a yearly report submitted to the DOE, implementation of a timely campus alert system, implementation of safety training programs for students and employees, and institutional policy statements that are made available to the public (U.S. Department of Education, 2016). As noted previously, implementation methods for these requirements are at the discretion of institutional administrators; however, the literature review illuminated the scarcity of scholarly research published on the strategies that institutional administrators use to approach Clery Act implementation. This constitutes a significant gap in the research (Gardella et al., 2014; Gregory & Janosik, 2012; Wood & Janosik, 2012).

Key Clery Act Compliance Details

Geographical location. Clery Act requirements are defined by geographical location (U.S. Department of Education, 2016; Wood & Janosik, 2012). The policy requires disclosure of crimes that occur on campus, adjacent to campus, or on properties that support an institution's educational purposes (34 CFR 668.46; U.S. Department of Education, 2016). The law is potentially confusing because although an incident might be a reportable crime it should not be

included in an institution's daily crime log or Annual Security Report (ASR) if it does not occur in a reportable area.

Reportable crimes. In addition to consideration of geographical location, not all crimes should be reported. For example, if publicly reporting a crime might in some way hinder an investigation or compromise a victim, then it should be excluded from institutional reporting (34 CFR 668.46). Reportable crimes are classified into four categories: criminal offenses, hate crimes, VAWA crimes (Dating violence, domestic violence, and stalking), and arrests/referrals for disciplinary action (34 CFR 668.46). Typically, the most visible crimes are the most violent. Mass shootings receive a great deal of media attention and have sparked conversations on a national level. Far less visible are the more common instances of potentially reportable incidents of campus property damage, robbery, and sexual assault. The word potentially is used with intentionality because as noted, institutional reporting is dependent on the geographical location of the crime and the classification of the type of crime. These two concepts are the basis for determining if a crime should be included in an institution's crime statistics (20 U.S.C. § 1092(f)).

Non-compliance Penalties

Clery Act compliance is of utmost importance for institutions that receive federal financial aid funding. In 2017, the U.S. Department of Education increased the penalty for significant noncompliance to \$54,789 per violation, making noncompliance a cost prohibitive prospect (Carter, 2017; Winn, 2017). Indeed, such penalties can quickly accrue and could severely impact the institutional budget. To illustrate, in November 2016, the U.S. Department of Education fined Penn State University almost 2.4 million dollars for Clery Act violations (U.S. Department of Education, 2016). In this modern era of postsecondary budget concerns, a

monetary blow of this stature can be crippling. Additionally, noncompliance includes the potential threat of losing access to financial aid programs, a possibility that would impact an institution's ability to recruit and retain students. Under such circumstances, careful adherence to Clery Act compliance is of utmost concern for institutional leaders. Therefore, individuals who work directly with the policy must be highly cognizant of the policy's details and vigilant to ensure that requirements are fully met. Furthermore, Clery Act facilitators must choose the most appropriate strategies to implement policy requirements so that their institution remains in compliance.

Title IV and Title IX

Title IV. Title IV of the *Higher Education Act* (20 U.S.C. §1070) and Title IX of the *Education Amendments of 1972* (20 U.S.C. §1681 et seq.) are two federal laws that play critical roles in Clery Act requirements. Notably, the Higher Education Act (HEA) is the legislative umbrella under which Title IV and Title IX are governed (U.S. Department of Education, 2016). Title IV governs the disbursement of federal academic grants, loans, and work–study money. To reiterate, the Clery Act requires that all postsecondary institutions participating in Title IV financial assistance programs comply with its established set of campus safety regulations.

Title IX. Title IX directly deals with civil rights, specifically gender equality. The Clery Act's *Violence Against Women Reauthorization Act* recodification heightened the relationship between these two laws (Pub.L. No.103–322). The *Violence Against Women Reauthorization Act* (VAWA) was codified to include amendments that aligned the law with the Clery Act by enforcing reporting requirements in the areas of campus dating and domestic violence, sexual assault, and strengthening the ways that hate crimes are reported (McCallion, 2014). Due to the importance of these issues and significant compliance factors, the designation of one or more

Title IX coordinators is mandatory for institutions receiving Title IV funds (20 U.S.C. §1681(d)). Title IX coordinators are responsible for providing policy implementation guidance, investigating complaints, and acting as a liaison between the institution and the U.S. Department of Education.

Conceptual Framework

Topical interest. Rigorous Clery Act research is necessary to understand strategies that institutions can implement to maintain compliance and to determine improved ways the policy can opportune safer campus communities. As demonstrated by the policy's evolving amendments and recodifications, the Clery Act is becoming more focused. Each change in the Clery Act has demanded a deeper scrutiny of strategic policy implementation nuances. In ratio, fines and penalties for noncompliance have also increased. These added points have led many institutional administrators to earnestly consider ways they budget human capital and money toward Clery Act implementation strategies.

Relevant literature. Since 1990, the Clery Act has undergone numerous amendments, reauthorizations, and recodifications. The bulk of the initial research conducted on the Clery Act gravitated toward perception studies and determining policy effectiveness. Emerging research has focused on the policy's recent amendments such as the signing of the Campus SaVE Act in 2013, and the reauthorization of the VAWA, also in 2013. These have sparked a plethora of studies (Dunn, 2014), and have also become timely subjects for campus conversations. Greater attention is being paid to improving institutional practice to mitigate crimes that include sexual assault, hate crimes, intimate partner violence, and stalking. However, the availability of peer reviewed publications of administrative strategies to mitigate crime and maintain institutional compliance remains scarce.

Theoretical framework. The theoretical framework identified for this study was institutional change theory. This theory was chosen as applicable to the scope of the study because it provides a meaningful lens to understand ways that the Clery Act has changed over the past three decades, and how such changes have prompted institutional administrators to responsively adapt their policy implementation strategies. Understanding the ways that the Clery Act has changed since its inception in 1990 is important for institutional facilitators to assess ways they address new regulations and adapt their practice accordingly.

Institutional change theory. Institutional change theory was first proposed by Streeck and Thelen (2005) to explain how policies enforced by institutions change to meet the needs of the stakeholders, and how these changes relate to policy transformation such as adaptation, exhaustion, and atrophy (Cerna, 2013). They theorized that these changes occur as processes embedded within institutional policy implementation. The basis of the theory resides in the concept that policies will undergo specific types of changes that are dependent on the actors (e.g., facilitators, stakeholders, and leaders) who implement process and enforce mandates. Streeck and Thelen further opined that these changes can be defined as either incremental or abrupt and will be framed by episodes of continuity or discontinuity (Busetti, 2015; Cerna, 2013; Streeck & Thelen, 2005).

Institutional change theory can be used as a model for investigative policy studies because it assigns responsibility for policy change to both internal and external factors (Cerna, 2013; Gomes & Du Pin Calmon, 2015; Mahoney & Thelen, 2010). Considering the number of changes that the Clery Act policy has undergone since 1990, this theory was chosen as an appropriate theoretical framework to explore strategies responsive to the policy's changing requirements used by institutional administrators to implement Clery Act policy requirements.

Purpose

The purpose of this intrinsic case study was to provide depth to current Clery Act research by exploring the implementation practices of Clery Act facilitators at a multicampus institution. This case study did not intend to provide a blanket overview of how the Clery Act is implemented in the United States, nor to determine what best practice strategies should be employed by institutional administrators. Instead, the purpose was to examine a single institution and to document the perceptions and strategies of its Clery Act facilitators. The findings from this study will create a foundation on which administrators at similar institutions can review their Clery Act policy implementation strategies.

Case study design is aptly suited for studying the Clery Act because it allows for exploration, “of a phenomenon within its context using a variety of data sources” (Baxter & Jack, 2008, p. 544). This is not to say that “anything goes,” but instead that context and purpose should form the research design. This study was designed with the consideration that Clery Act implementation is of primary interest to the research and bound by the perceptions and practice of facilitators who work at a multicampus public university.

This site was chosen for ease of researcher access to the sample population. Originally, this case study was designed to collect data from only one small campus of a large, multicampus university. Fifteen people were initially invited to participate. Due to challenges associated with obtaining participants, the study was opened to include Clery Act facilitators from all the institution’s campuses.

The target population included individuals who are employed at the site institution. These people worked for departments such as athletics, campus police, student life, student conduct, and human resources. With the realization that these departments have differing roles

in Clery Act policy implementation, it was understood that they share similar responsibilities as Clery Act facilitators. For example, Clery Act facilitators within each department might have an obligation to create campus safety programs or collaborate with other departments on the development and communication of such programming; the individuals from each department work actively with victims of campus crimes, and all the sample population was trained in Clery Act policy compliance procedures. These parallel professional duties became a common denominator for collected data in this case study.

Research Questions

Research questions are the epicenter of a study's methodology (Cousin, 2005; Creswell, 2012). Cousin (2005) noted that research questions act as a compass for case study researchers. Well-developed research questions provide a solid foundation for a study (Cousin, 2005; Creswell, 2014). To such an end, the research questions for this study were designed to guide the research toward rich descriptions of Clery Act implementation. The following questions were used to narrow the focus of the study:

RQ₁: What strategies do Clery Act facilitators at a public university use to implement the policy?

RQ₂: How do facilitators at a public university describe their Clery Act implementation strategies?

These questions were developed based on identified gaps in the literature review. Specifically, these research questions are integral to lend more information to the body of Clery Act research. The answers to these questions can potentially act as a launch board for meaningful academic discourse, which will, in turn, provide opportunities for other institutions to examine their policy implementation practice.

Rationale, Relevance, and Significance

Institutional administrators must comply with Clery Act regulations to avoid fines and to participate in Title IV financial assistance programs (20 U.S.C. 1092(f); 34CFR668.46). This study was designed in the hope of providing meaningful information to Clery Act administrators and compliance officers as they navigate a variety of available strategies to implement policy requirements. Previous research conducted on the Clery Act focused on topics such as ways that affected populations and stakeholders perceive the Clery Act, analysis of the policy through the lens of national statistics, and connections among institutional liability, compliance, and the Clery Act (Gregory et al., 2016; Wood & Janosik, 2012). Additionally, prior researchers studied the relationship between safety awareness and training and the Clery Act, victim self-reporting, and ways that specific types of campus violence (i.e., hate crimes, mass murder, sexual assault) were impacted by the policy (Gregory et al., 2016). However, the literature review revealed that there was a lack of single institution research that solely explored strategies used by institutional administrators to implement Clery Act policy (Woodward et al., 2016). This gap in knowledge is critical because policy approach could be dependent on the institutional type and geographic location of the institution (Wildavsky, Kelly, & Carey, 2011).

These characteristics can influence policy approach for several reasons. For example, Clery Act facilitators at a for-profit institution that is completely located in one office building and who are securing a small population of students have a different perspective of Clery Act implementation than those facilitators who work at large, public, multicampus institution. These institutional characteristics mold policy implementation and outcomes (Cerna, 2013; Fullan, 2011; Streeck & Thelen, 2005). Best practice for implementation at one institution may not be as appropriate at another (Wildavsky et al., 2011). Therefore, single institution case study

research is a necessary way to explore strategies available to administrators who implement Clery Act policy requirements.

Definition of Terms

Institutional change theory: This term is defined as a theoretical model used to study policy transformation in relation to institutional actors' implementation practices. First proposed by Streeck and Thelen (2005), this theory is an accepted model for investigative policy studies (Cerna, 2013; Gomes & Du Pin Calmon, 2015; Mahoney & Thelen, 2010).

Title IV (20 U.S.C. §1070): This term is defined as a federal regulation that administers the disbursement of student financial aid and monitors participating postsecondary institutions (U.S. Department of Education, 2016; Woodward et al., 2016).

Title IX (20 U.S.C. §1681 et seq.): This term is defined as the federal regulation that guides oversight for civil rights issues, specifically gender equality. All federally funded institutions participating in Title IV financial assistance programs must appoint one or more Title IX coordinators to provide policy implementation guidance, assist with investigating policy-related complaints, and act as a liaison between the institution and the U.S. Department of Education (U.S. Department of Education, 2016).

Assumptions, Delimitations, and Limitations

Assumptions. Assumptions are the preliminary beliefs and philosophical understanding that a researcher conjectures during the design of a study (Creswell, 2014). This study was approached with a few assumptions. First, based on the literature review it was assumed that the Clery Act was an ineffective, failing law. Additionally, it was assumed that participants would be forthright and honest during the interviews, so that their narratives would further empirical

research on policy implementation strategies and evolving perspectives of the Clery Act's impact.

Delimitations. Delimitations explain the boundaries of the study (Yazan, 2015). This case study was delimited to a small public campus located in the Midwest. This site was chosen primarily because of researcher access to the sample population. To such an end, convenience sampling was utilized to remain within the bounded framework of the site's campus. Therefore, the data for this study was collected only from individuals who worked at the site institution. All the institution's campuses were represented in this study.

Limitations. Potential limitations of this case study included the availability and number of identified participants. It was noted that limitations concerning participation were also a concern in other Clery Act studies. For example, when studying sexual assault victims, there is a chance that data is captured only from those who have come forward to report a crime, or who have self-identified as being assaulted. Gardella et al. (2014) found that it was difficult to conduct valid research on sexual assault victims due to the extent of victim underreporting of assault incidents. Often, victims are afraid to report the crime. Another known example of sampling limitation was documented by those studying sexual assault in the LGBTQ community. Some members of the LGBTQ community expressed concerns that public reporting has the potential to "out" them (NISVS, 2010). Furthermore, transgender victims have reported that they become extremely anxious when faced with the required medical exam that is mandatory for sexual assault victims (NISVS, 2010). These facts illustrate the ways that targeted population participation is a potential limitation in a few Clery Act policy studies. Based on these potential limitations, the targeted sample population was increased to include individuals from more than one campus department that facilitates Clery Act policy implementation.

Summary

This chapter provided the history of the Clery Act and introduced challenges associated with its implementation. The chapter also detailed the significance of compliance for participating Title IV institutions and explained the implications of noncompliance. Also identified was the way that institutional change theory undergirds Clery Act facilitators responsive implementation strategies. Institutional change theory was chosen as an appropriate model for understanding transformations to Clery Act policy that have occurred over the past three decades and how these changes have subsequently affected facilitator implementation strategies. Noteworthy is that while Clery Act policy changes have been gradual, these changes outwardly demonstrate that the policy is evolving in response to the transforming face of higher education. Of import in this chapter were gaps determined in Clery Act research, primarily in the areas of policy implementation. The subsequent chapters of this dissertation will explore prior research, document methodology, analyze data, and discuss results.

Chapter 2: Literature Review

The Clery Act is a federal policy composed of numerous regulations intended to mitigate campus violence and promote consumer awareness as students and their families review potential universities. First enacted as the *Crime Awareness and Campus Security Act of 1990* (Title II of Public Law 101–542), the policy was renamed the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* in 1998 (20 U.S.C. § 1092(f)). The Clery Act was updated through recodifications to include clauses that addressed sexual harassment, stalking, hate crimes, and emergency response procedures (McCallion, 2014). According to the U.S. Department of Education’s (2016) *Handbook for Campus Safety and Security Reporting*, the Clery Act amended the *Higher Education Act of 1965* (Pub. L. No. 89–329) and has been amended numerous times. Most recently, the *Violence Against Women Reauthorization Act of 2013* (VAWA) amended the *Violence Against Women Act of 1994*. Also, in 2013 the *Campus Sexual Violence Elimination Act* (H.R.2016) was passed. Commonly referred to as the SaVE Act (Voth Schrag, 2017), this bill was codified to provide additional requirements that specifically addressed dating and domestic violence, and sexual assault.

Compliance

The Clery Act requires that all postsecondary institutions participating in Title IV financial assistance programs comply with an established set of campus safety regulations. Some of the most important mandates include reporting campus crime and fire statistics, facilitation of a timely campus safety alert system, implementation of safety training programs for students and employees, and institutional policy statement disclosures (U.S. Department of Education, 2016). The Clery Act specifies what types of crimes are reportable and that institutions make a daily crime log publicly available; these crimes must also be compiled and

reported each year in an Annual Security Report (ASR) to the Department of Education (U.S. Department of Education, 2016). Additionally, Clery Act reporting requirements are defined by geographical location dependent on where such reportable events occur in relation to the campus. The policy requires disclosure of crimes that occur on campus, adjacent to a campus, or on properties that support an institution's educational purposes (20 U.S.C. 1092(f); 34CFR668.46). The U.S. Department of Education's (2016) *Handbook for Campus Safety and Security Reporting* defines the term *adjacent to campus* as areas consisting of public sidewalks bordering campus, public streets along the sidewalks, and the public sidewalk on the other side of the street.

Reportable crimes must be maintained by an institution's police or security department in a publicly available, daily crime log that includes, "the nature, date, time, and general location of each crime; and the disposition of the complaint, if known" (20 U.S.C. 1092(f), 4). However, the policy clarifies that crime data may be withheld if the release of such information might compromise ongoing criminal investigations or the safety of a victim, cause a suspect to flee, or affect the destruction of evidence (20 U.S.C. 1092(f), 4). Clery Act compliance officers must be aware of these policy details so that they can facilitate timely reporting of their institution's campus crime statistics.

Significance of Clery Act Research

Institutions must comply with Clery Act regulations to avoid hefty fines and to continue participation in Title IV financial assistance programs (20 U.S.C. 1092(f); 34CFR668.46). Therefore, research on the topic is critical so that facilitators understand the policy's details, scope, and impact (Gregory et al., 2016). Previous research conducted on the Clery Act focused on topics such as the ways that affected populations perceive the Clery Act, analysis of the

policy through the lens of national statistics, and connections among institutional liability, compliance, and the Clery Act. Additionally, previous researchers studied the relationship between safety awareness and training and the Clery Act, victim self-reporting, and the ways that specific types of campus violence (i.e., hate crimes, mass murder, sexual assault) were impacted by the policy.

However, the literature review revealed that there was a lack of single institution research that solely explored strategies used by institutional administrators to implement Clery Act policy (Woodward et al., 2016). Information derived from individual institutions is essential because institutional type and geographic location can influence campus characteristics (Wildavsky et al., 2011) that, in turn, mold policy implementation and outcomes (Cerna, 2013; Fullan, 2011; Streeck & Thelen, 2005). Best practice for implementation at one institution may not be appropriate at another (Wildavsky et al., 2011). Therefore, single institution case study research is a necessary way to document strategies that are available to administrators who implement Clery Act policy requirements.

Problem Statement

This study addressed the problem of understanding how higher education administrators implement strategies to facilitate Clery Act compliance and develop a safer campus community. There is scarce academic research published on the strategies that institutional administrators use to implement Clery Act policy (Wood & Janosik, 2012), and the literature review confirmed this fact (Gardella et al., 2014; Gregory & Janosik, 2012). This gap in knowledge is problematic because it is necessary to know how institutional administrators perceive their roles and implement Clery Act policy to keep their institution compliant. Determining effective policy implementation strategies can guide similar institutional administrators in their practice. Thus,

further research in this area is crucial to understand the strategies institutional leaders are employing to reduce fines and maintain compliance. Knowledge in this area can guide and improve Clery Act policy implementation. A single institution, case study design was identified as a relevant means to explore implementation practices that will be meaningful to similar schools. While it is understood that a case study may not be generalizable, it has the potential to provide information for similar institutional administrators. Narratives derived from case study research can spark discussions, and such conversations have the potential to improve Clery Act compliance and strategy implementation.

Other issues regarding the Clery Act reside in its detailed policy language and the lack of guidance on the strategies that institutional administrators use to implement Clery Act policy requirements (Gregory et al., 2016; McNeal, 2007). Clery Act policy regulations are extensive and detailed, necessitating collaboration among multiple campus departments. Although Clery Act compliance is monitored by the United States Department of Education (DOE), the DOE does not provide guidance on specific strategies institutional administrators should use to implement or facilitate Clery Act compliance (Gregory et al., 2016; McNeal, 2007; Wood & Janosik, 2012; Woodward et al., 2016). This is significant because institutions participating in federal financial assistance programs must decide how to best implement many of the policy's requirements, such as timely campus safety and emergency alerts and providing training programs to raise campus awareness on issues such as dating violence, domestic violence, hate crimes, sexual assault, and stalking (U.S. Department of Education, 2016). For example, one Clery Act requirement mandates that timely campus safety alerts should be issued during emergencies. However, the law does not specify what type of notification system institutional administrators should use. Instead, the policy recommends that each institution determine the

most appropriate mode of communication for their campus community (Woodward et al., 2016). To illustrate, the policy language acknowledges that emergency notification systems are dependent on the type of emergency or situation; while fire alarms may be appropriate in some instances, text notification may be more appropriate at other times. Determining best mode of notification and best course of action during an emergency requires the acumen of the administrator. The U.S. Department of Education (2016) also encourages institutions to maintain overlapping modes of communication in case one method fails. The discretionary nature of institutional Clery Act compliance demands an in-depth examination of strategies available to facilitators to implement the policy's requirements.

Title IV and Title IX

Title IV. Title IV of the *Higher Education Act* (20 U.S.C. §1070) and Title IX of the *Education Amendments of 1972* (20 U.S.C. §1681 et seq.) play key roles in the Clery Act's requirements. Title IV is the federal regulation that administers the disbursement of student financial aid and monitors participating postsecondary institutions (U.S. Department of Education, 2016; Woodward et al., 2016). Here, it should be noted that the *Higher Education Act* (HEA) is the umbrella under which both Title IV and Title IX are governed (U.S. Department of Education, 2016). As was explained in the introduction, the Clery Act is under the authority of the HEA, but it is directly enforced through Title IV. Noncompliance with Clery Act regulations can result in damaging institutional fines and the revocation of an institution's ability to participate in federal financial aid programming.

Title IX. In relation to Title IV, Title IX directly deals with civil rights, specifically gender equality, and in relation to the Clery Act it plays a significant role in the recently established *Violence Against Women Reauthorization Act* (Pub.L. No.103-322). This act, most

commonly referred to as VAWA, has been amended numerous times. Most recently, the *Violence Against Women Reauthorization Act of 2013* amended the *Violence Against Women Act of 1994*. Also, in 2013 the *Campus Sexual Violence Elimination Act* (H.R.2016) was passed; this act is commonly referred to as the SaVE Act (Voth Schrag, 2017). The SaVE Act was codified to provide additional requirements that specifically addressed dating and domestic violence, and sexual assault. Due to the importance of these issues, and compliance factors, the designation of a Title IX coordinator is not an option for institutions receiving Title IV funds (20 U.S.C. §1681(d)). Title IX coordinators are responsible for providing policy implementation guidance, investigating complaints, and acting as a liaison between the institution and the U.S. Department of Education.

Literature Review Organization

This literature review was organized to reflect a synthesis of Clery Act policy research. While peer reviewed research on the Clery Act policy is limited, a plethora of nonacademic articles on the topic of campus safety were available (Richardson, 2014). Of importance to this literature review is the fact that campus safety articles and scholarly Clery Act research were not granted the same consideration. Although it is true that there are points where these topics converge, there are many more areas where they diverge. For example, many of the nonacademic articles that have been published in some of the well-known postsecondary periodicals focused on available safety technology or innovations in campus safety mitigation. It is understood that both topics are timely and necessary for institutional leaders to stay abreast of; however, in juxtaposition, the reviewed scholarly literature gravitated toward exploring campus perspectives regarding Clery Act policy and policy analysis through the lens of statistical analysis. The focus of this research is the facilitation of Clery Act policy, specifically its

implementation on one campus. Therefore, the organization of the literature review assigned greater weight to studies that explicitly focused on the Clery Act policy rather than more broadly on campus safety, and peer reviewed literature that was published in academic journals was used to guide the overall study.

This literature review also explored theoretical ways to consider Clery Act research. Institutional change theory (Streeck & Thelen, 2005) was deemed a rigorous lens to scrutinize policy implementation strategies because of the way the theory offers an understanding of the evolution of the Act in accordance with its requirements. Grant and Osanloo (2014) referred to a study's conceptual framework as a blueprint and noted that "It provides a common worldview or lens from which to support one's thinking on the problem and analysis of data" (p. 15). The literature review continues with a review of research literature and methodological literature that was organized by four themes: Clery Act perception, Clery Act legislation, Clery Act compliance, and Clery Act implementation. These categorical themes were created to establish easily understandable boundaries for discussion of the literature. Lastly, this literature review offers a critique of previous research, and this became the basis for the direction of this study.

Conceptual Framework

Topical interest. In an ever-changing world, rigorous Clery Act research is necessary to understand ways that institutions remain compliant while at the same time effect safer campus communities. Due to the policy's evolving amendments and recodifications, advocacy groups and lawmakers have responded to current situations and social needs by tightening the policy's focus. Each change in the Clery Act demands a deeper scrutiny of strategic policy implementation nuances. In juxtaposition, fines and penalties for noncompliance have increased

to the point that many institutional administrators now lend serious thought to ways they budget human capital and money on Clery Act implementation strategies.

Relevant literature. The bulk of initial research on the Clery Act gravitated toward perception studies and determining policy effectiveness. Since 1990, the Clery Act has undergone numerous amendments, reauthorizations, and recodifications. Scholarly research on the policy's most recent changes, such as the signing of the Campus SaVE Act in 2013 and the reauthorization of the VAWA, also in 2013, have sparked a plethora of studies (Voth Schrag, 2017). The topics associated with these changes have become timely subjects for campus conversations, and much attention is now paid to improving institutional practice to mitigate crimes that include sexual assault, hate crimes, intimate partner violence, and stalking. However, available peer reviewed publications on administrative strategies to mitigate crime and maintain institutional compliance remain scarce.

Seminal authors. The proposal for this dissertation was foundationally based on the works of a handful of key Clery Act researchers. Noteworthy is the fact that Gehring, Gregory, Janosik, and Fisher published multiple studies on the topic of Clery Act policy during the 1990s and early 2000s. Fisher's work was primarily focused on legal ramifications of the policy, while Gehring, Gregory, and Janosik's research was directed toward Clery Act awareness and perception. Ultimately, these notable scholars endeavored to determine the effectiveness of the Clery Act.

Theoretical Framework

The theoretical framework identified for this study was institutional change theory. This theory was chosen as applicable to the scope of the study because it provides a meaningful lens to understand the manner in which the Clery Act has changed over the past 30 years and the

subsequent ways that institutional administrators have responsively adapted their strategies to implement policy changes. Elements of institutional change theory undergird this study's problem statement by offering an appropriate direction for exploring Clery Act changes in relation to current events and situations that directly impact strategies used by institutional administrators to implement policy requirements. Another significant way that institutional change theory acts as a foundation for exploring Clery Act implementation lies in how the theory explains policy change as relational to actor facilitation. Institutional change theory is a widely accepted model for policy studies (Busetti, 2015; Cerna, 2013; Gomes & Du Pin Calmon, 2015; Mahoney & Thelen, 2010), and it was chosen as the most appropriate theoretical framework for researching strategies employed by institutional administrators to implement Clery Act requirements.

Institutional change theory. Institutional change theory was first proposed by Streeck and Thelen (2005) to explain how policy changes relate to outcomes such as adaptation, exhaustion, and atrophy, and that these changes occur as processes embedded within institutional policy implementation (Cerna, 2013). The theory defines ways that policies will undergo specific types of changes that are dependent on the actors who implement process and enforce mandates and that these changes can be explained as either incremental or abrupt and will be framed by episodes of continuity or discontinuity (Cerna, 2013; Streeck & Thelen, 2005). Institutional change theory is used as a model for investigative policy studies because it assigns responsibility for policy change to both internal and external factors (Cerna, 2013; Gomes & Du Pin Calmon, 2015; Mahoney & Thelen, 2010). Considering the number of changes that the Clery Act policy has undergone throughout the past three decades, this theory was chosen as the

most appropriate theoretical framework for understanding strategies used by institutional administrators to implement Clery Act policy requirements.

Institutional change theory is hailed as an influential structure to frame policy research primarily because it provides an understandable map of how and why policies evolve or break down (Cerna, 2013). Streeck and Thelen's (2005) theory was developed to explain how policy changes relate to outcomes such as adaptation, exhaustion, and atrophy, and occur as processes embedded within institutional implementation. Institutional actors can effect change (Streeck & Thelen, 2005). In the case of this study these actors were identified as campus stakeholders such as administrators, employees, and students. Cerna (2013) noted, "Policy change goes hand in hand with policy implementation" (p. 25). Cerna (2013) also clarified that merely passing policy or law does not preclude intended outcomes; but rather that policy actors must work toward policy adoption and implementation. The importance of this theory from an institutional perspective is critical in higher education (Cerna, 2013; Mehta, 2013), especially in relation to Clery Act facilitation. Institutional actors effect policy transformation and impact change (Gomes & Du Pin Calmon, 2015; Streeck & Thelen, 2005). Institutional change theory is an appropriate tool to understand strategies used by institutional administrators to implement Clery Act requirements, and how these strategies have responsively changed in relation to changes in the policy.

Types of policy changes. Institutional change theory explains that policies will undergo determined changes that are dependent on the actors who implement process and enforce mandates. Streeck and Thelen (2005) presented five types of change that are defined as either incremental or abrupt, and that each type of change is framed by episodes of continuity or

discontinuity. Paraphrasing Streeck and Thelen's (2005) five types of institutional change, the following is a brief overview of their definitions:

1. Displacement—Policies replaced by more effective rules.
2. Layering—New elements (cultural, economic, political, or social) drive the development of policy modifications or recodifications.
3. Drift—Lack of adaptation begins the process of erosion and/or atrophy.
4. Conversion—New policy goals are determined based on external forces (actor practice, or cultural, economic, political, and social dynamics).
5. Exhaustion—Policy demise occurs through a gradual, nonabrupt erosion.

Gomes and Du Pin Calmon (2015) further explained the ways that policy continuity and discontinuity impact these types of change. Gomes and Du Pin Calmon (2015) stated that continuity is expressed by equilibrium and that "The traditional model of punctuated equilibrium is represented by the combination of abrupt change with discontinuity, which results in disruption and replacement" (p. 4). Since being signed into law, the Clery Act has demonstrated periods of incremental and abrupt discontinuity, with fewer periods of equilibrium. This is evinced in amendments to the Clery Act that were codified in 2000 (*Campus Sex Crimes Prevention Act*, Public L. No. 105–244), 2008 (*Higher Education Opportunity Act*, Public L. No. 110–315), and 2013 (*Campus Sexual Violence Elimination Act*, H.R.2016; *Violence Against Women Reauthorization Act*, Public L. No.103–322). With each transformation of Clery Act policy, institutional actors were required to evaluate new requirements for policy implementation.

Economic, cultural, political, and social factors. As is the case with many public policies, the Clery Act's current visage was created by external pressures that can be best

understood through economic, cultural, political, and social factors. As noted by Streeck and Thelen (2005):

Just as the surrounding society affects both parties through the constraints and opportunities it creates for socially backed rulemaking and rule enforcement, it is itself affected by the social and political influence exercised by agents lobbying for their interpretation of social rules and norms. (p. 14)

Streeck and Thelen (2005) clarified that policy is relational to shared cultural understanding between involved people, and this understanding may transform depending on the inter-relationship of the actors or their relationship with the policy.

Review of Research Literature and Methodological Literature

There is no simple approach to Clery Act implementation or the mitigation of campus violence. The topic of campus safety, and Clery Act policy, encompasses a broad spectrum of issues. These issues include, but are not limited to, campus crime statistic reporting, campus crime response, campus safety mitigation options and trends, violence mitigation projects, sexual assaults on campus, vulnerable population self-reporting and safety, campus gun restriction debates, institutional directives, policy frameworks, and safety training and prevention options (McNeal, 2007; Wood & Janosik, 2012). In addition to campus safety and violence mitigation, higher education administrators must be vigilant to embrace the importance of Clery Act lawsuits and legal proceedings as well as the institutional budget and human capital concerns that impact the strategies used by policy facilitators to implement required outcomes (McNeal, 2007).

Review of Research Literature

Since Fisher's (1995) first academic study of the Clery Act, the body of work regarding the Clery Act has grown slowly, but as Robinson and Roh (2001) stated, "there has been very

little rigorous research on campus crime” (p. 2). However, Gregory and Janosik (2012) noted, “There has certainly been [more] commentary, particularly in the periods after each tragic incident, [but] there has been little research on the act and its impact and implementation” (p.1). Gregory and Janosik (2012) explained that many aspects of campus crime had been documented; however, there was a relative lack of literature that specifically explored the strategies used by institutional administrators to implement Clery Act requirements.

Clery Act scholars reviewed in this literature examination highlighted how challenging Clery Act research is, often because the distinction between literature pertaining to the actual policy and literature examining campus crime is blurred. This could be due to the difference between policy and practice, and/or between policy and implementation, and the ways that researchers have approached these concepts. Of note is that a cursory, online search of campus safety articles is more likely to reveal a local postsecondary institution’s publicly available campus crime logs or Annual Security Report (ASR) than peer reviewed research on the Clery Act (Herrmann, 2010; Kennedy, 2010, 2011; Weisenbach, Keller, & Hertz, 2011). Therefore, while this literature review identified a plethora of nonpeer-reviewed studies that explored campus safety without mention of the Clery Act, and conversely peer-reviewed Clery Act studies that examined compliance without investigation of policy implementation strategies, the goal was to intentionally identify scholarly articles that addressed implementation strategies. Studies that delve into the strategies used by institutional administrators to implement Clery Act policy requirements are now more necessary than ever to provide practical models for safer campus learning environments.

Seminal researchers. Although rigorous academic literature on the Clery Act is relatively scarce, there are a few scholars who have contributed significantly to its research.

Fisher (1995, 2000, 2002, 2009) actively studied the Clery Act since the policy's first signing and was credited as being a pioneer Clery Act researcher (Gardella et al., 2014; Wood & Janosik, 2012). Gregory and Janosik, also forerunners in Clery Act research, conducted extensive research on the policy; coauthoring together (Gregory & Janosik, 2002, 2003, 2006, 2009, 2012), publishing solely (Gregory, 2004; Janosik, 2001, 2004), and at times with other scholars (Janosik & Gehring, 2003; Janosik & Plummer, 2005; Wood & Janosik, 2012), to present findings that are critical to understanding how the Clery Act impacted campus safety. Fisher, Gregory, and Janosik were foundational academics in the field of Clery Act research, and because of their groundbreaking studies, they were identified as seminal scholars.

Literature Themes

To compose a holistic understanding of the challenges faced by institutional administrators implementing Clery Act requirements to maintain institutional compliance, this literature review explored both Clery Act research and campus safety research, with more weight given to investigation that was specific to the Clery Act policy. From the onset, there was a deliberate effort to focus on the policy, rather than more broadly on campus safety. Peer reviewed Clery Act policy studies were identified as most applicable, and the campus safety studies were included to provide a context of the policy's evolution and impact through a wider lens. The policy is best understood through practice, and as Fullan (2003) explained, "For the past 30 years, research and practice has focused on identifying key factors associated with failed or successful implementation" (p. 2). Fullan's (2003) words demonstrate the marked necessity to explore policy implementation.

To organize the reviewed literature, four primary themes were identified: policy perception, policy legislation, policy compliance, and policy implementation. The themes are

relational, and each area impacts one, or more, of the other areas. The themes are undergirded by cultural, economic, political, and social constructs that will be discussed further in this review.

Policy perception. Clery Act researchers widely examined policy perception. Janosik and Plummer (2005) noted that policy perceptions “affect how policy and administrative decisions are made, how resources are allocated, and how students are helped” (p. 127). Research in policy perception gravitated toward campus stakeholder awareness of the policy, and the ways they perceive, or are impacted by, its regulations (Chekwa, Thomas, & James Jones, 2013; Janosik, 2001, 2004; Gregory & Janosik, 2002, 2003, 2006, 2009; Janosik & Gehring, 2003; Janosik & Plummer, 2005). Surveyed populations included current and prospective students (Chekwa et al., 2013; Janosik, 2001), parents (Gregory & Janosik, 2002; Janosik, 2004), officers of student judicial affairs and student affairs (Gregory & Janosik, 2003, 2009), residence life administrators (Gregory & Janosik, 2006), campus law enforcement officers (Bromley & Reaves, 1999; Janosik & Gregory, 2003), and assault victim advocates (Janosik & Plummer, 2005). Often these studies were conducted via a researcher–designed questionnaire. The response frequencies were tabulated and analyzed. It is relevant to note that every study concluded with the fact that very few stakeholders are aware of the Clery Act. The policy’s intent and regulations are not visible, and researchers stated that this fact contributed to perceptions that the policy is ineffective.

In many ways, earlier Clery Act perception studies outwardly appear identical. In some instances, even using the same survey questions for each of the different populations. For example, Gregory and Janosik's (2006) research on resident life and housing professionals’ perception of the Clery Act was conducted via a survey consisting of 33 questions. In full

disclosure, Gregory and Janosik (2006) explained that the questionnaire was adapted from prior Clery Act perception studies they had each designed. However, the use of recycled questions in no way indicated lack of rigor. The reality is that the similarity of the questions provided a common denominator that allowed for a much more straightforward synthesis of the studies. Based on the almost standardized questions developed by Gregory and Janosik, current researchers can identify patterns evidenced in the responses of unique populations in higher education. These patterns can be synthesized to create a better understanding of how to improve practice and implementation of the Clery Act.

Policy legislation. Policy perceptions directly impact legislative change, and by extension, other legal outcomes associated with Clery Act implementation (Cantalupo, 2011; Richardson, 2014; Voth Schrag, 2017), and they do so on their opinion of the effectiveness of its regulations. The Clery Act has undergone significant changes since its inception in 1990, and the bulk of the amendments are a result of sociopolitical forces (Clery Center, 2017). For example, in 2000 and again in 2013, two subsequent amendments to the Clery Act raised provisions to protect students against sexual assault, harassment, and stalking crimes (Clery Center, 2018; Voth Schrag, 2017). It is evident that the evolution of the Clery Act is a natural response to social change. Voth Schrag (2017) noted, “contemporary interpersonal violence research . . . stands as a testament to many students, faculty, and staff members committed to preventing interpersonal violence in campus communities” (p. 76). Policies naturally evolve or dissolve, and they do so in parallel union with external forces (Streeck & Thelen, 2005; Wolfram, 2012). In response, institutions must be willing to adjust their policy implementation practices accordingly.

In relation to the Clery Act's legislative changes is the noticeable transformation of legal outcomes, at both civil and institutional levels. These changes can be attributed to the fact that with each progression of the Clery Act's amendments there have been additions and changes to its requirements (McCallion, 2014), and that the fines for noncompliance have increased enormously (Carter, 2017; Winn, 2017). It is evident that such changes would impact the way civil and criminal cases are tried, and the manner in which the U. S. Department of Education determines institutional liability. There is a documented advancement of court decisions to support this correlation (Koebel, 2017; Richardson, 2014). Most visible are the increasingly steeper fines assessed by the Department of Education for Clery Act violations (Koebel, 2017; Richardson, 2014; Sabina & Ho, 2014). In conjunction with institutional fines are the increasing amount of civil and criminal cases where the courts base their decision on policy change (Kaplan & Lee, 2013; Richardson, 2014). These merely serve to demonstrate the critical relationship between sociopolitical impact and legal outcomes.

Perception of policy impacts policy legislation through cultural, economic, political, and social forces, and the synthesis of these two themes impact institutional compliance. As Janosik and Plummer (2005) noted, policy perceptions affect the way that policies are implemented. The severity of penalties for institutional noncompliance is currently levied with a \$54,789 fine (Carter, 2017; Winn, 2017). Dunn (2014) explained, "With the recent VAWA amendments, the Clery Act is now further aligned with federal obligations under Title IX" (p. 571). In the event of a noncompliance determination, universities not only run the risk of damaging monetary fines but are also faced with the possible loss of federal Title IV funds (White House Task Force, 2014). It is for this reason that compliance was identified as an integral theme in the literature review.

Policy compliance. Compliance is of interest for institutional leaders because it directly impacts institutional budgets (Cantalupo, 2011; Koebel, 2017; Raab & Rocha, 2011). Not only does Clery Act compliance demand both human capital and monetary investment, but noncompliance will also result in fines that can be potentially damaging to an institution, and in extreme cases will cause the loss of federal funds. In 2015, the U.S. Department of Education increased the penalty for significant noncompliance to \$54,789 per violation, making noncompliance a cost-prohibitive prospect (Carter, 2017; Winn, 2017). Indeed, such penalties can quickly accrue and could severely impact an institution's budget. For the most part, the reviewed studies focused on institutional investment of the mandatory distribution of policy materials (Gehring & Callaway, 1997; Gehring, Callaway, & Douthett, 2000), or specifically on damages incurred by institutions involved in high profile cases where punitive fines were decided by the Department of Education (Cantalupo, 2011; Fox & Savage, 2009; Wood & Janosik, 2012). Cantalupo (2011) remarked, "In light of such large fines and settlements, it is baffling to see schools regularly acting against their clear interests in avoiding quite expensive liability" (p. 219). Cantalupo's (2011) assessment begs the question of why Clery Act compliance is not a more widely researched subject, and additionally why Clery policy implementation has not become a more significant administrative concern. Compliance with the Clery Act supports campus safety and waylays monetary penalties, both of which should align with every institution's mission and goals (Richardson, 2014). Why then are not more stakeholders aware of the policy and its requirements?

Policy implementation. Policy implementation is relational to policy perception because of the necessity for institutional administrators to maintain compliance and avoid legislative penalties. Gregory and Janosik's (2003) research on the perceptions of campus

judicial officers determined that “changes in its focus and enforcement, financial and other support for campus police agencies, recognition of programs that have made a difference on campus safety, and additional research on the Act's impact would improve its effectiveness” (p. 196). Their words echo the findings of others in the field (Blanchard, 2013; Mayhew, Caldwell, & Goldman, 2011; Wood & Janosik, 2012). Understanding the numerous strategies used by institutional administrators to implement policy requirements can be a critical factor for postsecondary institutions as they pioneer their policy strategies. It is for this reason that more in–depth research on the topic of policy implementation is necessary.

In this literature review, there were only a handful of scholarly studies conducted on Clery Act implementation (Bromley & Reaves, 1999; Gregory & Janosik, 2002; McNeal, 2007; Raab & Rocha, 2011). These studies did little justice to the depth necessary to understand the importance of Clery Act implementation. For example, Bromley and Reaves’ (1999) research on this topic was conducted by reviewing the strategies of sworn and nonsworn campus officers. Bromley and Reaves’ (1999) study harkened to elements of prior perspective studies and evidenced that in addition to Clery Act reporting requirements more attention should be directed toward safety programming. Bromley and Reaves’ (1999) research also begs the question regarding the manner in which such programming can be implemented. The same can be said of McNeal’s (2007) study, which consisted of an online survey whose participants were members of International Association of Campus Law Administrators currently working at colleges and universities in the United States. McNeal (2007) concluded that the solution to Clery Act implementation challenges begins with a collective effort among all levels of an institution's departments.

In consideration of the hefty fines and the potential loss of Title IV funding, the lack of available policy implementation guidance should be a concern for institutional leaders. Gregory and Janosik (2002) stated that in higher education there is no “uniform, easily understood process of reporting campus crime, and that disagreement over the Act’s implementation still exists” (p. 15). It is for this reason that greater strides should be made to bridge gaps in Clery Act implementation research. Coupled with these important considerations is the need to conceptualize and frame the exploration of Clery Act implementation, and it is for such a reason that in addition to scholarly Clery Act literature, institutional policy research was reviewed, as well as case study design. These items were synthesized to explore the way that Clery Act policy is implemented at one institution.

Summary of Literature Themes

In this review of Clery Act literature, the relationship between policy perception, policy legislation, policy compliance, and policy implementation demonstrated the need for further research: research intended to provide guidance for improved institutional practice and process of Clery Act policy. The progression of scholarly Clery Act literature was determined to become progressively more focused throughout the years. For example, early research tended to examine stakeholder perspectives, while more recent studies have gravitated towards Clery Act amendments such as the *Campus SaVE Act* (S 834, 2011) and the *Violence Against Women Act* (S 47, 2013). These recent amendments both address grave matters for consideration and scholarly research on these topics lend weight to their importance. More recently published studies do not explore Clery Act implementation from the vantage point of a single institution case study. This gap in the literature creates a rift in the knowledge base necessary for

institutional leaders to understand implementation strategies that will help maintain institutional compliance with Clery Act policy requirements.

Review of Methodological Literature

The design of a research study is integral to the validity of its results, and a methodology that works perfectly for one study may be unsuited for another. In the realm of Clery Act research, most of the studies reviewed were predominantly qualitative or mixed methods (Janosik, 2001, 2004; Janosik & Gregory, 2003, 2009; Janosik & Plummer, 2005); only a few quantitative studies were identified (Janosik & Gregory, 2012; Wood & Stichman, 2018). This literature review determined that the bulk of the research was conducted either via mixed-methods of large populations or by means of policy analysis and review. Such studies are critical for seeing the big picture, yet there is also a need for more variation in design and scope. It is for this reason that the methodology of the reviewed literature was identified, synthesized, and analyzed to present an understanding of methodological strengths and weaknesses for constructing an approach to this Clery Act study.

Quantitative research. Within the body of the reviewed literature, few studies were purely quantitative. This may be attributed to the anthropological approach many researchers used to frame their inquiries, and these studies were typically constructed to analyze the relationship of variables such as comparative compliance statistics (Gehring & Callaway, 1997) or help-seeking behaviors of sexually victimized students (Wood & Stichman, 2018). One aspect of quantitative methodology that might appeal to researchers is that studies that present numerical results may appear to public audiences as more precise or scientific (Creswell, 2014; McMillan, 2012). Pure data can also be problematic because it can lead to skewed perceptions when taken out of context. Chalabi (2014) explained that too often statistics are misused by the

media and others, and that data is misrepresented and slanted to suit the needs of the reporting agency. For instance, reporting agencies might focus on only one set of the variables, which in turn can confound the overall data.

Qualitative research. The reviewed Clery Act literature was predominantly composed of qualitative and mixed methods design. As previously noted, many of the early researchers of Clery Act policy tended to study stakeholder perceptions. Creswell (2014) explained that qualitative studies are typically constructed to explore social problems. Such studies are also valid for exploring relationships among variables. For example, stakeholder perception may be dependent on sociopolitical factors, and quantitative methodology was an appropriate vehicle for exploring this connection. Early Clery Act research was conducted via mixed methodology. Most studies utilized quantitative analysis to interpret and measure the responses of populations impacted by the Clery Act's mandates, while at the same time providing supplementary details and narrative to support the data.

In studies conducted after the initial enactment of the Clery law, many researchers selected pools of participants from the national population to analyze statistics derived from multiple institutions or organizations. These studies were designed to provide a broader understanding of the Clery Act's national impact. The limitations of broadly constructed studies include potential generalizations and the pitfall of missing details that may be found at a micro-level. For example, one of the earliest Clery Act studies conducted by Gregory and Janosik (2003) explored the perceptions of International Association of College Law Enforcement Officers (IACLEA) members. The researchers invited 944 individuals to participate and received 371 responses to their questions regarding how the Clery Act has transformed campus law enforcement, its ability to reduce campus crime, and ways it has impacted student behaviors.

However, because the participant population was chosen from a broad, national range of participants, it is difficult to determine if variables such as location or institutional type influenced the responses. Consequently, it may be challenging for institutional leaders to make a meaningful connection to their campus community.

A strength of qualitative methodology is that it provides researchers with an opportunity to approach the study design using a variety of instruments, and as Atieno (2009) noted, qualitative methodology can generate “new ways of seeing existing data” (p. 16). For instance, qualitative research design offers researchers a less rigid venue to collect the perceptions of the participants or the populations whom they are examining. McMillan (2012) noted that qualitative research is relativistic and socially constructed, and typically the methodology emerges during the research. This process allows the researcher room to develop the study more thoroughly, and the flexibility to adjust direction based on emerging evidence and participant needs (McMillan, 2012). Although qualitative research is as formal as its quantitative counterpart, it outputs data in the form of words instead of numbers (McMillan, 2012). There is dignity in words, and by contrast, numbers sometimes appear as a harsh analytical tool. Moreover, there are certain types of research that demand a level of gravity that only words can express. Victims and victim bystanders deserve the respect that pure data may not be able to provide. As researchers, we must be ever vigilant to demonstrate an ethic of care for those we study. Accordingly, Clery Act researchers must be especially vigilant to ensure that their studies lend dignity to the participants or the population being studied.

Case study. Compared to previous studies, case study research design is an atypical approach to Clery Act policy studies. Blanchard (2013) published a mixed–method, multi–institution case study that coded interviews from three institutions to examine Clery Act

implementation. This research more accurately reflected the intent of this study in its use of narrative combined with data, yet the study was broadly framed in its scrutiny of public and private institutions. Overall, this research review revealed significant methodological gaps, especially in the lack of single institution studies. Creswell (2014) stated that case studies “are a strategy of inquiry in which the researcher explores in depth a program, event, activity, process, or one or more individuals” (p. 13). Creswell (2014) paraphrased Stake’s (1995) definition of case studies as being bound by time and activity, and that they allow researchers the opportunity to employ a variety of “data collection procedures over a sustained period” (Creswell, 2014, p. 13). Case studies are qualitative and, as such, they are slightly more flexible than quantitative research (Creswell, 2014). Case studies appeared to be the least usual form of research design employed by researchers studying the Clery Act. In this literature review, there were only two Clery Act studies that implemented this design for the research (Blanchard, 2013; Marshall, Betron, Bubbers, & Keightley, 2016). The lack of case study research on this subject might be attributed to several reasons, including length and depth of the study, the focus of the researcher, or available resources. These limitations are apparent concerns for many researchers as they choose their methodology.

In juxtaposition to these limitations, there are numerous reasons why case study design is an appropriate choice for framing Clery Act research. Case study design provides opportunities not available in other types of formal inquiry (Harrison, Birks, Franklin, & Mills, 2017). For example, case studies allow researchers the ability to narrowly tailor their focus, while at the same time providing the chance to review other artifacts and details that are relevant to the study. Sykes (2016) noted:

Each case is taken as evidence of the stages in the unfolding process of social relations between specific persons and groups. When seen as such, we can dispense with the study of sentiment as accidental eruptions of emotions, or as differences of individual temperament, and bring depth to the study of society by penetrating surface tensions to understand how conflict constructs human experiences and gives shape to these as “social dramas,” which are the expressions of cultural life. (para. 3)

Based on the strengths of case study design, it was chosen as the most suitable design for this Clery Act study.

Review of Methodological Issues

Sampling limitations. In addition to methodology design, there are other limitations that researchers must be vigilant to avoid. One that potentially might be found within a variety of methodologies occurs when there is the chance that essential populations are excluded from scrutiny, which can lead to skewed results (Tipton, 2012). Sample recruitment in many of the reviewed Clery Act studies, especially ones designed to survey selected populations, invited people from specific populations to participate. This is frequent practice in educational research. As Tipton (2012) explained, “The goal is for the sample to be selected so that it is compositionally similar to a well-defined policy-relevant population” (p. B-4). However, sampling limitations have the potential to reduce the generalizability of the findings. For example, in McNeal's (2007) research on Clery Act compliance, the participants were recruited from members of the International Association of Campus Law Administrators (IACLEA). The survey was sent to 420 subscribers of the IACLEA listserv and resulted in 221 responses. These participants were asked 20 questions, based on a five-point Likert type scale, and their responses

were statistically analyzed to determine perceptions regarding implementation and institutional support. However, the results of this study require attention to the fact that the participants hailed from an international forum, and the Clery Act is a federally governed, American policy. There is a possibility that administrators from institutions located outside of the United States weighed in with responses. Additionally, due to the wide variety of American institutional type, it is problematic for specific institutions to apply the findings to their policy implementation strategies.

Researcher bias. The human experience manifests in the unique ways that we each understand and act within the context of our personal history. This fact is the first piece in analyzing the methodology of previous literature, for researchers bring a part of themselves to the design of the study. Merely by involvement, a researcher's worldview will be integrated into the study (Creswell, 2014; Shuttleworth, 2009). Although some might declare that any bias is negative, others counter that it is a necessary element (Machi & McEvoy, 2012). Machi and McEvoy (2012) argued that personal bias drives interest and dedication, both of which are necessary qualities for study completion. Machi and McEvoy (2012) further stated, "If these attachments remain embedded and unidentified, the research can be severely compromised" (p. 21). Researchers must recognize their investment in a study to ensure that it does not cloud methodological choice, study design, or data analysis.

In a review of previous research, the motives that drive another researcher are not always apparent, and there is always the possibility that bias may be a design or methodological issue. Therefore, it is important to consider the reviewed research from a bipartisan standpoint, one that connects the study's premise with its design and outcomes. For example, Wood and Janosik's (2012) Clery Act research delved deeply into the importance of intercampus collaboration to

develop strategies for mitigating crime. It should be noted that both scholars are faculty at Virginia Tech, an institution that paid \$32,500 in 2012 for fines levied against the institution by the DOE for violations of the Clery Act (Fox & Savage, 2009; Layton, 2014). Notably, in one of the most important findings of the Virginia Tech Review Panel (2007), the team assigned to investigate how and why the Virginia Tech massacre happened, was that the violence that occurred in 2007 could have been prevented if better communication had occurred between the departments that had dealt with the shooter. It may be construed that by institutional involvement, Wood and Janosik (2012) were inspired to explore details of the Virginia Tech massacre more fully. The tragedy served as an impetus for more in-depth campus violence research and became a source of conversations across the country regarding campus safety regulations. Wood and Janosik's (2012) interest in the Virginia Tech massacre highlights the fact that researcher bias is not always negative; there are instances when studies are inspired to promote positive change.

Summary of methodological issues. Ultimately, a researcher's choice of research design is impacted by several variables, all of which must be carefully considered prior to data collection and analysis (Creswell, 2014; McMillan, 2012). Foremost, researchers must attend to methodological items that create ethical, feasible, and valuable results. There is no methodology that can be unconditionally appropriate for every type of research. Therefore, researchers must heavily weigh all the foundational elements of their intent prior to launching their study. Within the context of Clery Act research, researchers have employed a wide variety of methodologies, and some have noticeably become more popular than others (Blanchard, 2017; Gregory & Janosik, 2012). Many of the earliest Clery Act studies focused on stakeholder perception, while many of the more recent studies explore victim advocacy and response.

The literature review yielded many approaches to studying the Clery Act, and populations impacted by the policy. The strengths and weaknesses of these methodologies were identified, and it was concluded that the qualitative method of case study research seemed highly advantageous to provide added information to the field. Primarily, case studies offer greater flexibility for studying populations affected by the Clery Act. Secondly, case study research would provide a means of research that is not repetitive in this field. Lastly, case study design would be a vehicle for not only briefly scrutinizing a diverse population, but also for documenting their narratives and giving the voices of the policy facilitators a chance to be heard.

Synthesis of Research Findings

In these decades after the inception of the Clery Act, more research is necessary to develop viable policy implementation models (Gregory et al., 2016; Gregory & Janosik, 2012). The process of reviewing Clery Act literature revealed that the body of available peer reviewed research was predominantly composed of national studies. Cooper and Hedges (2009) stated, “Presenting the background, methods, results, and meaning of a research synthesis' findings provide the final challenges to the synthesists' skill and intellect” (p. 14). To such end, this research review organized Clery Act research into four themes that were used to create a framework to understand the history and the current state of the Clery Act. It was determined that the Clery Act impacts many aspects of higher education and it was apparent that there was a relative lack of single institutional Clery Act research.

This literature review identified four themes relevant to Clery Act research: perception, legislation, compliance, and implementation. The literature explored in the first theme revealed a humanistic approach to the research and identified that researchers' most commonly asked question revolved around how participants perceived the Clery Act. These studies gathered

responses intended to provide an ontological connection between people and policy (Chekwa et al., 2013). The second theme reviewed research that focused on legislative issues and legal cases relative to Clery Act policy (Cantalupo, 2011; Richardson, 2014; Voth Schrag, 2017). This theme demonstrated the progression of Clery Act amendments and subsequent changes in appellate decisions on Clery Act litigation. Also, this category could be identified as sociopolitical and economic in nature, as it is accepted that such items drive policy change (Cerna, 2013; Mehta, 2013; Streeck & Thelen, 2005); therefore, analysis of legal and legislative change was a logical approach to reviewing Clery Act research.

In contrast to the above themes of policy perception and policy legislation, the last two themes, policy compliance and policy implementation, are more action oriented. The reviewed literature organized into the last two categories evinced the importance of the institution as a policy actor and the level of responsibility that accompanies effective Clery Act facilitation. There was considerably less available research in these areas. However, the reviewed literature was revealing, and among the studies there were several common denominators, including the way in which Clery Act implementation challenges many institutions, the need for campus wide involvement to effect policy facilitation, and the condition that institutional leaders commit adequate funds to policy implementation (McNeal, 2007; Nolan, 2015). McNeal's (2007) survey of campus safety officers stated, "Based on the factor analysis results, it appears that campus law administrators perceive lack of institutional support and funding as a hindrance to Clery Act compliance efforts" (p. 110). Similar findings were revealed by Nolan's (2015) research on collegiate intimate partner violence and stalking, newly included violations added to the Clery Act in 1994 as part of the VAWA amendment. It is noteworthy that Nolan (2015) determined institutions will have to invest substantial time and effort to comply with the Clery Act, and that

effective policy implementation will require the concerted efforts of multiple departments including Title IX coordinators and the institution's legal counsel. Cantalupo (2011) suggested that focusing merely on policy instead of implementation and procedure “can make an otherwise good policy virtually worthless” (p. 256). In consideration of the reviewed literature, it is difficult to question this logic.

Critique of Previous Research

What is known about the effectiveness of the Clery Act? What is best practice for policy administrators to maintain institutional compliance? The policy still raises debate among policy analysts and campus stakeholders, so many questions remain unanswered. There are critics who have decried its effectiveness, while others demand more stringent ramifications; very few administrators or policymakers are completely happy with its present condition (Gardner, 2015). This literature review explored ways that researchers approached studying the Clery Act and cataloged the various arguments for and against the policy's effectiveness. In overview, these studies were categorized by commonality and synthesized to present a basis for evaluation. Past findings evinced several noteworthy items. Markedly, it was determined that most campus stakeholders, and the general population, were unaware of the Clery Act's purpose (Chekwa et al., 2013; Gregory & Janosik, 2002, 2003, 2006, 2012; Janosik, 2004; Janosik & Gehring, 2003; Janosik & Gregory, 2003, 2009; Janosik & Plummer, 2005). Secondly, most researchers indicated that Clery Act policy implementation could be more effective if institutions focused human capital and funds on safety training and awareness programs instead of policy compliance (Gregory & Janosik, 2003). Lastly, one of the most clearly voiced arguments was that, to date, the Clery Act has failed in its intent to create safer campuses (Gregory & Janosik, 2002; Griffaton, 1993; Gardner, 2015).

Initial Clery Act research conducted by Gregory and Janosik (2002, 2003, 2006), Janosik (2004), Janosik and Gehring (2003), Janosik and Gregory (2003, 2009) and Janosik and Plummer (2005) not only argued that most campus stakeholders were unaware of the Clery Act's intent, but these studies ended with a resounding call for more research. Later researchers studied a variety of universal details regarding campus safety, and many agreed that campus safety training and safety awareness programming might be more effective than mere policy (Chekwa et al., 2013; D'Arcy & Hovav, 2009; Gregory & Janosik, 2012; Peak, Barthe, & Garcia, 2008). More recently, research has shifted toward studying the victims and identifying best practice for explicitly supporting them (Gardella et al., 2014; Knowles & Dungy, 2010; Myers, Nelson, & Forke, 2016; Sabina & Ho, 2014). Many studies proactively called for training bystanders to be involved in mitigating potentially volatile situations (Cares et al., 2014). Within the breadth of this extensive research review, very few studies were identified that examined strategy practice or connected ways that the Clery Act has changed with policy implementation, nor was case study design used to explore policy implementation.

One common argument noted throughout the literature review was that the Clery Act is an ineffective campus safety policy and that it is costly for universities to maintain compliance. Senator McCaskill of Missouri lobbied to have the policy annulled and has deemed the Clery Act flawed, burdensome, and outdated (Gardner, 2015). The Senator is not alone in his sentiment. Other Clery Act researchers have arrived at this same conclusion and have argued that there are more effective strategies to mitigate campus safety and promote consumer awareness (Mayhew et al., 2011; Nobles, Fox, Khey, & Lizotte, 2012). Indeed, Gregory and Janosik (2012) noted that although campus crime has declined in accordance with national crime statistics, "*Clery* [sic] does not seem to have had the positive impact that its sponsors had hoped" (p. 9). Furthermore,

Gregory and Janosik (2012) agreed with Fisher's (2002) premise that the Clery Act was merely a symbolic effort. Given these points, more research on the Clery Act is necessary.

In this literature critique, not only were common themes synthesized but also the gaps in research were identified to determine where future studies should be focused. Specifically, there was a noted gap in the analysis of the Clery Act from the perspective of institutional change theory or case study approach. Although case studies are not likely to be generalizable, they are a significant voice in Clery Act conversations. Findings derived from case studies provide results that can be meaningful to similar institutions and act as a roadmap for nonsimilar schools to approach their case studies. Analyzing the Clery Act, bounded within the context of one university, can evidence the tangible and modern impact of the policy.

Summary

The Clery Act is a law composed of many federal policies. Institutions found in violation may face fines for noncompliance and other profound consequences such as the loss of Title IV programming. No Title IV funded institutions are immune to the policy's impact. Violations may also result in revocation of institutional financial aid status, and most institutional leaders would agree that is a sobering prospect. For this reason alone, facilitators of Clery Act policy must be highly cognizant of the policy's regulations. Therefore, this literature review intended to create a foundation for understanding previous Clery Act research and provide a means to frame how future studies can contribute significant information to the field. Additionally, this literature review demonstrated that there were identifiable gaps, not only in the depth of the research but also in the way that previous researchers connected the Clery Act with policy implementation. The systematic review revealed a lack of focused analysis or detailed investigation of single institution Clery Act implementation. Inquiry such as this is necessary to fill the research gap

and provide a better understanding of strategies that institutional administrators can employ to augment safety on their campuses. While case studies may not be generalizable, they offer a meaningful approach for similar institutions to develop strategies that create safer campus communities and might act as a roadmap for nonsimilar schools to approach their case studies to develop practical Clery Act implementation processes. Gregory and Janosik (2009) opined, “No program, no facility modification, and no amount of technology can prevent crime from happening on campuses, but these efforts have much greater potential than continuing to focus on crime statistic reporting” (p. 226). The Clery Act offers the opportunity to influence campus safety innovation, yet to date has not done so (Wood & Janosik, 2012). There is an implicit need for more Clery Act research that is minutely focused on the strategies employed by institutional policy actors to remain compliant with Clery Act regulations.

Chapter 3: Methodology

There is a need to understand strategies that institutional administrators use to implement Clery Act policy. Although Clery Act policy requirements mandate specific outcomes, they do not prescribe the way institutions remain compliant (Wood & Janosik, 2012). As a result, Clery Act policy implementation is at the discretion of the institution. Additionally, best practice for implementation at one institution may not be as appropriate at another (Wildavsky et al., 2011). Lastly, scarce academic research exists on the strategies that colleges and universities are using to approach Clery Act compliance (Wood & Janosik, 2012). Through the process of an extensive literature review, this gap in research was noted (Gardella et al., 2014; Gregory & Janosik, 2012). Based on these facts, single institution case study design was chosen to explore policy implementation practices that may be meaningful to similar schools. Although it is understood that case study research may not be generalizable, it can potentially provide relevant information for similar institutions. Narratives derived from case study research can spark discussions, and such conversations have the power to further our understanding of Clery Act compliance and implementation.

The methodology for this study was qualitative, and the design focused on a single institution case study. The objective was to explore the strategies of administrators at one institution who implement the Clery Act policy. This study was conducted using interviews combined with observational notes and artifacts to document the perceptions of Clery Act facilitators at a multicampus, public university. A semistructured interview technique was identified as the most likely to help participants feel at ease. When possible, observational notes were taken during the interviews, and artifacts such as campus specific daily crime logs and Annual Security Reports (ASR) were analyzed to triangulate the data. These three types of data

collection were identified as appropriate ways to obtain reliable results regarding Clery Act implementation at a multi-campus institution.

Research Questions

Some scholars advise that research questions should be developed after the literature review and after the development of a conceptual framework (Cousin, 2005; Stake, 1995; Yazan, 2015). Yazan (2015) stated, “Literature review is an essential phase contributing to theory development and research design. Theoretical framework merging from literature review helps mold research questions and points of emphasis” (p. 148). It was noted that well-crafted questions will provide thick descriptions (Cousin, 2005; Stake, 1995), and the research questions for this study are the essence of the inquiry. However, there is still argument among case study researchers regarding the creation of research questions. Cousin (2005) explained that some case study researchers recommend hypothesis-led questions, while others suggest that a better approach includes the formation of load bearing, issue questions.

In accordance with the concept that research questions are at the epicenter of a study, Cousin (2005) noted that the questions act as a compass for case study research. Based on that analogy, the research questions for this study were designed to reflect a load bearing approach to undergird inquiry toward rich descriptions of Clery Act policy implementation. To such an end, the following questions were developed to guide this research:

RQ₁: What strategies do Clery Act facilitators at a public university use to implement the policy?

RQ₂: How do facilitators at a public university describe their Clery Act implementation strategies?

These load bearing questions were created based on identified gaps in the literature review that highlighted a lack of concrete policy strategy at individual institutions. These research questions were aligned to lend more information to the body of Clery Act research. The answers to these questions will launch meaningful academic discourse which can, in turn, provide opportunities for other institutions to examine policy implementation practice at their campus community.

Design and Purpose

The purpose of this intrinsic case study was to provide depth to current Clery Act research by exploring the strategies used by institutional administrators to implement Clery Act regulations. Stake (1995) contended that research is necessary to elevate our understanding of the world, and this case study endeavored to do so by contributing to the body of knowledge regarding Clery Act implementation. Cousin (2005) noted, “Although a form of generalization might come from a focus on the singularity of a case . . . the research aims to generalize within rather than from the case” (p. 422). Notably, this case study does not intend to create a blanket overview of how the Clery Act is implemented in America, or even to broadly determine best practice strategies that should be employed by every public university. Instead, the purpose was to weave a fabric that is solely derived from the thread of a single institution, which similar universities can use to review their implementation strategies, and to provide a compass for nonsimilar institutions to begin a comparable policy practice review.

The literature review determined that there were significant gaps in Clery Act research (Gregory & Janosik, 2012), including a lack of studies that examine single institutional implementation and practice. Stake (1995) explained that intrinsic case study focuses on the case, while an instrumental case study is dominated by the issue being studied. Based on this concept, intrinsic case study was identified as a vital component of this study’s design. Stake

(1995) noted that within the boundaries of intrinsic case study, “the case is of highest importance” (p. 16). Clery Act policy implementation at the site institution was established as the case and became the hub of this inquiry. Additionally, Stake (1995) argued that intrinsic case study requires focus on the study's contexts. Such contexts can include, but are not limited to, descriptions of the physical arena where the case is located, current or past economic or political landscapes, and any other pertinent factors that offer “historical, cultural, or aesthetic” context (Stake, 1995, p. 64). There is no set formula for determining what factors provide detailed context, yet a rigorous researcher will richly describe items to “develop vicarious experiences for the reader” (Stake, 1995, p. 63). Thus, the researcher’s narrative lends voice to the perceptions of the participants.

Qualitative methodology was chosen to richly document ways that Clery Act administrators implement policy strategy. In this study’s conceptual stage, two types of design were reviewed as possible approaches. Policy analysis research design was first reviewed because it intersected at many points with the study’s theoretical framework of institutional change theory. Policy analysis research design was ultimately rejected because it did not offer an open arena for studying Clery Act facilitators’ perceptions of their roles and their contribution to campus safety. Policy analysis research design is focused primarily on the examination of the identified policy’s guidelines, whereas case study research allows the exploration of the experiences and perceptions of the population being studied (Baxter & Jack, 2008; Yazan, 2015). Therefore, case study research was chosen as a rigorous way to study Clery Act facilitators at the site institution.

Case study design is aptly suited for studying the Clery Act because it provides scrutiny “of a phenomenon within its context using a variety of data sources” (Baxter & Jack, 2008, p.

544). This is not to say that “anything goes,” but rather that context and purpose should form the study. Additionally, consideration must be granted to the undergirding paradigm. According to Guba and Lincoln (1994), “Differences in paradigm assumptions cannot be dismissed as mere ‘philosophical’ differences: implicitly or explicitly, these positions have important consequences for the practical conduct of inquiry, as well as for the interpretation of findings and policy choices” (p. 112). Succinctly stated, the decision to approach a study from a constructivist or positivist paradigm can influence many other areas of the study. For example, a constructivist would “claim that truth is relative and that it is dependent on one's perspective” (Baxter & Jack, 2008, p. 545). In juxtaposition, a positivist would argue that “research tradition aims at capturing or discovering an accurate or approximated knowledge about the case under scrutiny” (Yazan, 2015, p. 146). These divergent perspectives are a critical factor in research design. Based on the intent of this study, a constructivist paradigm was identified as a foundation for the research questions and guided the design of the research. Intrinsic case study, fortified by a constructionist paradigm, augmented ways to capture the perceptions of Clery Act facilitators. These approaches respect that the participants’ viewpoints can shape the way they implement institutional strategy, thus demonstrating that truth is relative to each participant’s unique perspective.

Research Population and Sampling Method

This intrinsic case study was designed to approach Clery Act research by exploring the strategies and perceptions of individuals who implement the policy. At most universities, such people hail from a variety of departments, including but not limited to admissions, campus police/security, housing/residential life, or student conduct. At the identified study site, the policy facilitators were people who worked in a wide variety of departments and who were

responsible for varying levels of Clery Act policy implementation. This study used purposive, homogeneous sampling, an approach that focuses on populations who share distinct qualities (Etikan, Musa, & Alkassim, 2016). The individuals invited to participate were identified based on shared qualities such as employment at the site institution and their contributions to Clery Act compliance at the site institution.

Clery officials, campus security authorities, and Title IX coordinators. This study's participants hold a diverse range of Clery Act policy responsibility. Some of the participants are employed in positions that require daily attention to Clery requirements while others dedicate professional time to policy implementation on a weekly, monthly, or annual basis. There are three primary levels of institutional Clery Act responsibility: Clery officials, Campus Security Authorities, and Title IX coordinators.

Clery officials. Individuals with heightened levels of policy implementation responsibility are referred to as Clery officials. A Clery official is defined by the Department of Education (2016) as a person who has significant responsibility for student or campus activities, and who has the authority to act or respond to a reported crime on behalf of the institution.

Campus security authorities. Participants who supported Clery compliance as a part of their position but whose duties are not primarily Clery related were either Title IX coordinators or campus security authorities (CSA). CSA is a title created by the Department of Education (2016) to differentiate institutional administrators who have significant responsibility for Clery compliance (Clery officials) from those who are trained in the institution's security policies and Clery compliance. The Department of Education recommends that institutions maintain a current list of CSAs.

Title IX coordinators. Title IX coordinators are responsible for providing Title IX policy implementation guidance, investigating complaints, and acting as a liaison between the institution and the U.S. Department of Education. Title IX directly deals with civil rights, specifically gender equality and, as part of the Clery Act, it plays a significant role supporting the recent Clery changes established with the recodification of the Violence Against Women Reauthorization Act (Pub.L. No.103–322). The designation of a Title IX coordinator is mandatory for institutions receiving Title IV funds (20 U.S.C. §1681(d)). Aligning the Clery Act with Title IX furthered legislative intent to protect vulnerable campus populations.

Overlapping responsibilities. Clery officials, Title IX coordinators, and campus security authorities (CSA) are titles representing various levels that institutional administrators focus their professional responsibilities towards supporting Clery policy implementation and promoting campus safety. Many of their obligations overlap, especially in policy compliance areas such as reporting and training. The designation of Clery official, CSA, and Title IX coordinator represent the distinct levels of responsibility participants possess in supporting Clery policy implementation. At the forefront is the fact that all the participants were cognizant of their obligations to report crime, submit monthly or yearly reports, and to collaborate with their campus's Clery official to ensure that reportable crimes were added to the institution's ASR. No matter what their level of responsibility entailed, participants indicated that they strove to promote campus safety.

Sampling method. To achieve an ideal sample size, individuals identified as Clery Act facilitators at the site institution were invited to participate in the study. Although there was the potential that all who were invited would agree to participate, interviewees were chosen on a first come, first serve basis, and once data saturation was reached data collection was terminated. It

was noted that the invitees held divergent roles in relation to Clery Act policy implementation, but true to the intent of this study, the desire was to explore all the ways that the policy is facilitated at the site institution. Contribution to Clery Act policy implementation was the common denominator that determined invitation to participate in this case study.

In the reviewed literature, sample populations were often selected using probability sampling. Researchers would identify a large population and then request participation through survey or questionnaire. These selected individuals had the opportunity to opt in or opt out of the study. Probability sampling such as stratified random sampling and cluster sampling may save a researcher time and money but can potentially lead to higher chances of error due to nonresponse or uninformed feedback. In juxtaposition, purposive, homogeneous sampling focuses on populations who share distinct qualities. “The idea is to focus on this precise similarity and how it relates to the topic being researched” (Etikan, Musa, & Alkassim, 2016, p. 3). Etikan et al. (2016) stated, “The purposive sampling technique, also called judgment sampling, is the deliberate choice of a participant due to the qualities the participant possesses” (p. 2). This statement aptly explains how participants for this study were chosen. The individuals invited to participate were identified based on shared qualities such as employment at the site institution and their contributions to Clery Act compliance.

Participants identified as Clery Act policy facilitators at the site institution were each invited by email for one-on-one interviews. The invitation email provided a brief overview of the intent and scope of the study and stressed the importance of the individual’s perspective as a device to assist others in the field of Clery Act research. Selected individuals who did not respond were emailed one additional time a few weeks later. Lack of response to the follow-up email removed their name from the list of prospective participants.

Instrumentation

The literature reviewed revealed that Clery Act researchers often created broadly based, national studies in which participation was invited from large populations and conducted by means of a survey or questionnaire (Chekwa et al., 2013; Gregory & Janosik, 2002, 2003, 2006, 2009; Janosik, 2001, 2004; Janosik & Gehring, 2003; Janosik & Plummer, 2005). In some instances, the questionnaire was mailed to the participants, other times those who chose to opt in to a study were directed to a set of online questions, and in a few cases, participants were verbally invited to respond to a paper copy survey. Some research methodologists noted that there are both advantages and disadvantages to interview research, no matter how the questionnaire is offered, whether by mail, by phone, online, or via the internet. The benefit of questionnaires lies in the fact that they are inexpensive, nonthreatening, and anonymous. However, questionnaire responses might lack the ability to provide the full story. By contrast, case study research has the unique ability to provide narrative analysis and richer details that might not be derived from questionnaires (Brinkmann, 2016; Stuckey, 2013). Based on the need for detailed policy implementation strategies, a triangulation of one-on-one interviews, artifacts, and observation were chosen as optimal instruments for this study.

Interview. Qualitative researchers who use interviews to collect data employ a variety of methods. Interview as instrumentation is acknowledged as one of the most common types of qualitative data collection (Brinkmann, 2016; Jamshed, 2014). There are guidelines for conducting rigorous interviews; depending on the type of research and the issue under examination, interviews might be structured, semistructured, or unstructured (conversational). Structured interviews are sometimes referred to as in-depth or standardized interviews (Anderson, 2010; Creswell, 2014), while semistructured interviews include open-ended

questions, and allow participants to offer more information than might have been asked because, “The object of the interview is for the interviewer to know, by the end of the interview, how the respondent perceived what happened” (Albright, Howard–Pitney, Roberts, & Zicarelli, 1998, p. 8). The last type of interview—unstructured—is defined by broadly– based questions, which may not always be preplanned (Jamshed, 2014). Researchers have noted that this type of interview may be best employed when there is little known about the case that is studied and might serve to pave the way for further research and more defined questions (Albright et al., 1998).

Various researchers interchange the term conversational interview with both semistructured and unstructured interview methodology. Albright et al. (1998) expressed that both unstructured and semistructured interviews are akin to conversation. It is true that the line between these types of ethnological interviews are blurred; however, the decision to choose one type of interview technique over another was primarily dictated by the desire to triangulate collected interview data with observational evidence. It is understood that observation is most appropriately conducted when participants are comfortable and acting naturally (Brinkmann, 2016; Jamshed, 2014; Stuckey, 2013). Therefore, to help participants remain at ease, a semistructured interview technique was identified as the most rigorous way to collect data.

Interview questions. A uniform set of questions was created for the interviews (see Appendix A); however, it was acknowledged that other questions could emerge during the scheduled conversation. The scripted questions were designed to not be invasive to help participants feel at ease. Additionally, conversational questions allowed for the emergence of other topics and questions during the semistructured interview, providing further opportunities for data collection and creating pathways toward unanticipated findings.

Field testing. Jacob and Ferguson (2012) observed that field testing interview questions with members of a similar population to the one being studied can “allow you talk with someone who may provide important insider information that can make your interview protocol work better without squandering the population you wish to interview” (p. 6). Therefore, to ensure that the interview questions were appropriate, clear, and rigorous they were first field tested on a nonparticipant identified as a Clery Act facilitator at an outside institution. This person was a Title IX coordinator at a university adjacent to the site institution. The feedback provided from field testing helped clarify and define the scripted interview questions used in this study.

Interview protocol. This study's interview protocol was based on a synthesis of recommendations made by Creswell (2014), Jacob and Ferguson (2012), and Stake (1995, 2010). Interview protocol is essential as it standardizes the process and supports consistency in data gathering (Creswell, 2014; Stake, 2010). The use of prescribed interview methods in this study optimized rigorous data collection and strengthened the trustworthiness of the findings. The interview protocol included seven scripted questions that were open ended in nature to allow room for the participant to fully answer. Clarifying questions were asked during every interview and unanticipated findings were revealed from these conversations. Additionally, participants were provided ample response time for questions so they could fully explain their thoughts.

Observation. Observation is an essential research tool that is regarded as a rigorous means of collecting data (Creswell, 2014; Stake, 2010). Case study requires that researchers richly document the experiences and perceptions of those they study, and observation is an optimal means to collect data. Many researchers highly regard observation as a means for obtaining qualitative data because it helps situate them in the study and serves to augment the perceptions of those they study (Creswell, 2014; Harrison et al., 2017; Stake, 2010). In this

study observational data was gathered when available by means of handwritten notes made by the researcher during participant interviews. These observational notes were used to triangulate other collected data.

Observation protocol. Observation protocol was used in this study to ensure rigorous and evidenced-based data collection and to maintain consistent observational notes. The protocol developed for this study was based on a synthesis of recommendations made by prominent research methodologists (Creswell, 2014; Stake, 2010), and incorporated the use of a standardized observation form that was divided into two sections to differentiate between descriptive notes and reflexive notes. Observation was recorded when available. Due to the way that interviews were conducted, either in person, via WebEx, or by phone, observational data was not always available.

Artifacts. Physical artifacts were identified as necessary to triangulate this study's interview and observation data. According to Harrison et al., (2017), "Methods used in case study to facilitate achieving the aim of co-constructing data most often include observations, interviews, focus groups, document and artifact analysis" (p. 6). The artifacts gathered for this study included daily crime logs posted by each of the site institution's campuses, Annual Security Reports (ASR), and other miscellaneous items obtained during the data collection process. These items were used to triangulate interview and observation data.

Rich and thick descriptions. Data was documented using thick descriptions, richly detailed narratives of Clery Act facilitator implementation strategy. Ponterotto (2006) emphasized that the methodological term *thick description* may be confusing for some researchers and offered guidance to effectively employ these techniques in research, and stated that thick description "speaks to context and meaning as well as interpreting participant

intentions in their behaviors and actions” (Ponterotto, 2006, p. 541). Ponterotto (2006) further explained:

Thick description leads to thick interpretation, which in turns leads to thick meaning of the research findings for the researchers and participants themselves, and for the report’s intended readership. Thick meaning of findings leads readers to a sense of verisimilitude, wherein they can cognitively and emotively place themselves within the research context. (p. 543)

Perhaps the most important aspect of Ponterotto's (2006) explanation is his correlation between thick description and thick interpretation, because that is the heart of this intrinsic case study. The intent was to document participant perception in a meaningful way that not only garners the interest of other researchers but also invites more open conversations about Clery Act implementation.

Member checking. Member checking is the process of providing respondents with drafts of their interview transcript, or observations made by the researcher about them, to solicit feedback (Jacob & Furgurson, 2012; Stake, 2010). The importance of this technique resides in its utility to confirm accuracy. Stake (2010) explained that member checking helps protect human subjects and reduces the risk of errors. However, Stake (2010) hazarded that member checking is a slow process and may add time to the length of the study. Immediately upon completion of interview transcription, participants were provided with a transcript of their interview and asked to approve or approve with changes (see Appendix C).

Data Collection

Case study design allows for multiple avenues of approach and is becoming more widespread as a means of collecting rigorous, qualitative data (Morgan, Pullon, Macdonald,

McKinlay, & Gray, 2017; Stake, 2010; Yazan, 2015). Simply because prior Clery Act researchers based their data collection on survey response and Likert scale analysis does not mean that future studies should also be tailored in such a fashion. In contrast to prior studies, this case study intended to provide in-depth and detailed documentation of the policy implementation strategies that Clery Act facilitators use at one institution. Data was collected by means of semistructured interviews, observation, and artifacts.

Stake (1995) noted that there is no specific instance when data collection starts and argued that observation and interview protocol should be designed to offer greater understanding of the case. Stake further acknowledged, “information and interpretation categories (are) driven by the research questions” (Stake, 1995, p. 51). Following such logic, this case study combined conversational interviews with observation and artifacts to answer the following research questions:

RQ₁: What strategies do Clery Act facilitators at a public university use to implement the policy?

RQ₂: How do facilitators at a public university describe their Clery Act implementation strategies?

Interview, observation, and artifacts are appropriate for this specific case study because these types of data collection contributed to the richness of the narrative. In addition to providing thick descriptions, these methods rigorously triangulate and lend to the trustworthiness of the results. There are many ways to triangulate data, including using multiple sources or methods to verify the credibility of collected information. This study used data gathered from interviews, observation, and artifacts to document information from multiple departments that implement Clery Act policy at the site institution. Once interviews were transcribed, and

artifacts and observation were documented, member checking was employed to ensure that participant perception was accurately narrated. The following is the step-by-step data collection protocol for this intrinsic case study:

1. Individuals were invited to schedule a half hour interview with the researcher. The interview was scheduled within a few weeks of a positive response to the invitation and was conducted via the most easily accessible means for the interviewee.
2. Individuals who agreed to participate were provided with a consent form that was signed prior to the interview (see Appendix B). This form and the participant's rights were fully explained and reviewed before the onset of the interview.
3. Each of the conversational interviews were conducted using the same seven scripted questions (see Appendix A). Emergent clarifying and prompt questions were intended to extend the conversation and were documented. One of the primary goals of this research was to create a safe space for participants to share their voice and explain who they are and what they do in relation to Clery Act policy implementation.
4. In-person interviews were recorded with a tape recorder that was openly visible during the interview. WebEx and phone interviews were also recorded, and participants were notified of this fact prior to the start of the interview. Participants were also alerted when the recording was stopped at the end of the interview.
5. Observational notes, when available, were recorded during the data collection phase using researcher defined observational protocol.
6. Participants were given the opportunity to review and edit their transcript. The ability to review, add to, clarify, and/or redact any part, or parts, of the documented interview prior

to transcription allowed participants control over the data collected by the researcher (see Appendix C).

Identification of Attributes

The Clery Act's reporting requirements are highly detailed, and it was expected that some facilitators might explain its attributes with compliance-heavy language. Also understood was that other facilitators at the site institution might approach Clery Act policy from a purely campus safety perspective or through a lens of advocating for victims of campus crime, and such people might be less informed about policy regulations. None of these are wrong approaches to the Clery Act; however, in and of themselves they cannot paint a complete image of Clery Act policy implementation. Each of these narratives are pieces of the entirety of the picture. This concept demonstrates the importance of this research. It is through exploration of ways that each participant contributes to Clery Act facilitation that one can then understand the greater image, map institutional relationships, and pinpoint effective strategies.

New to conversations regarding Clery Act policy is the balance of rights for victims and alleged perpetrators. These topics are becoming points of discussion, and are producing more Clery Act research (Cantalupo, 2011; Raab & Rocha, 2011; Voth Schrag, 2017). Found within these various themes are identifiable shared concepts that were determined to be common attributes of the Clery Act. Table 1 defines and organizes the Clery Act's intrinsic attributes: adaptation, campus safety, compliance, and implementation.

Table 1

Clery Act Attributes

Attribute	Definition	Measurement
Policy Adaptation	Gradual change policy	Incremental changes in policy practice
Campus Safety	The overall well-being of the campus community	Campus climate surveys, artifacts, interviews, and observation
Compliance	Conformance to Clery Act regulations	Observation of practice and Department of Education feedback/reports
Implementation	Strategies that institutional administrators use to implement Clery Act policy	Observation, triangulation

Data Analysis Procedures

Initially, several qualitative data analysis programs were explored to streamline this study's analysis, including MAXQDA, Atlas.ti, and Dedoose. Ultimately, hand coding was determined to be the most optimal approach to analyzing this study's information, as it maintained researcher proximity to the data (B. Parsons, personal communication, November 2017). Furthermore, hand coding transcripts provided an opportunity to further reflect on the interview and strengthen correlations between the interviewee's words and nonverbal signals such as body language or voice inflection. Other considerations, such as data security and timeliness were identified as integral to rigorous research and hand coding was determined to be the most effective means to effectively support these efforts.

Data analysis protocol. Data analysis is a critical aspect of qualitative methodology (Creswell, 2014; Stake, 2010). An analysis of the data was conducted in the following manner:

1. A semistructured interview, observation, and artifacts were used to document Clery Act facilitator's implementation practice.
2. The researcher transcribed interviews to maintain proximity to the data.
3. Transcripts were hand coded by the researcher based on standard coding protocol and responses were coded to align with the intent of the research questions.
4. Data was double coded to ensure rigorous results and provide trustworthiness in the findings.
5. Interview data and observation data were triangulated with artifacts and member checking to heighten accuracy.

It was expected that approximately 12 interviews and related instances of observation would be triangulated with campus artifacts for analysis. This research sought to provide rigorous findings that document understanding of Clery Act implementation at the site institution.

Coding. The coding method for this study emerged from the research questions. Clery Act policy implementation is action oriented and the first round of *a priori* codes (see Appendix D) were developed to rigorously capture participant involvement in Clery Act implementation strategies and campus safety practice. The first patches consisted of seven broad codes that identified implementation, collaboration, perception, training, reporting, and compliance. Saldana's (2016) coding protocol was employed to guide this process, and transcripts were coded multiple times to ensure that there was no variance in results (Baxter & Jack, 2008; Saldana, 2016).

Limitations and Delimitations of the Research Design

Anderson (2010) aptly stated, "Qualitative research is often criticized as biased, small-scale, anecdotal, and/or lacking rigor; however, when it is carried out properly it is unbiased, in-

depth, valid, reliable, credible and rigorous” (p. 2). Every researcher should recognize their study’s limitations to circumvent potential issues. To such an end, the two following sections present, with full transparency, the circumstances and issues that impacted this study’s data collection and analysis.

Limitations. Researchers noted that there can be limiting factors in qualitative analysis (Anderson, 2010; Atieno, 2009), and to reduce the risk of inaccurate analysis it is necessary to acknowledge these before data collection begins (Harrison et al., 2017). Limitations of this case study included a smaller population sample and participation. Limitations concerning participation were also noted in prior Clery Act studies. For example, when studying sexual assault victims, there is a chance that data is captured only from those who have come forward to report a crime, or who have self-identified as being assaulted. Gardella et al. (2014) found that it was difficult to conduct valid research on this population due to the extent of victim underreporting of assault incidents. Often, victims are afraid to report the crime. Another known example of sampling limitation has been documented by those studying sexual assault in the LGBTQ community. Some members of the LGBTQ community have expressed concerns that public reporting has the potential to “out” them (NISVS, 2010). Furthermore, transgender victims are reported to become extremely anxious when faced with the required medical exam that is mandatory for sexual assault victims (NISVS, 2010). These examples illustrate ways that targeted population participation can be a potential limitation in Clery Act research. To avoid sample population limitations, the targeted population was increased to include individuals from more than one campus at the site institution.

Delimitations. Delimitations reflect the boundaries of the study (Yazan, 2015). This case study was delimited to a multicampus, public university. This site was chosen primarily

because of researcher access to the sample population. To such an end, convenience sampling was utilized to remain within the bounded framework of the site's campus. As explained by Etikan et al. (2016), when a researcher chooses participants due to their proximity, then "the researcher is making a convenience sampling" (p. 2). In addition to convenience sampling, the sample population was selected using purposive homogeneous sampling framed by individuals who shared the quality of Clery Act facilitation. This study's data was collected only from administrators at the site institution who supported Clery Act policy implementation efforts.

Validation

Researchers agree that producing valid results is of utmost importance; however, debate remains regarding the best method to achieve this goal (Anderson, 2010; Baxter & Jack, 2008; Yazan, 2015). Anderson (2010) explained that validity in research is relative to the extent of the findings' accuracy in conjunction with the phenomena being studied. Researchers have noted that validity is best understood through the concepts of credibility, dependability, and reliability (Baxter & Jack, 2008; Morgan et al., 2017; Yazan, 2015). These three concepts should be considered during each phase of the data gathering and analysis to achieve rigorous results.

Credibility. Credibility refers to the 'truth value' of the findings, and there are several ways that it can be achieved. Morgan et al. (2017) offered that triangulation and member checking are two of the most important aspects. Baxter and Jack (2008) also recommended that researchers employ multiple data sources, and further argued that prolonged exposure to the phenomena is critical to affect credibility. Lastly, Stake (2010) reflected that credibility is situated within the researcher's "studied perception of situations in context" (p. 47). These guidelines were used to establish credibility in this study.

Dependability. Baxter and Jack (2008) suggested that dependability can be accomplished by using multiple researchers to code data, or for a single researcher to double code the data. Double coding is the process of coding the data, and then later recoding the data to confirm that the same results are achieved (Baxter & Jack, 2008; Saldana, 2016). Although this study does not allow for multiple researchers to code data, double coding was a viable option and one that was employed to ensure valid findings.

Reliability. Reliability is indicative of the “reproducibility and stability of the data” (Anderson, 2010, p. 2). There are several ways that case study researchers can establish reliability, such as by stating the researcher's position in the study, triangulation, and maintaining an audit trail (Yazan, 2015). Furthermore, Baxter and Jack (2008) offered that researchers can ensure reliability by using a database to track and organize sources, notes, and artifacts.

Confidence. This case study combined credibility, dependability, and reliability to obtain rigorous results. Data collection was conducted using the above credibility, dependability, and reliability techniques to establish confidence and validity. Listed below are the ways that this study provided confidence in the collected data.

1. Interview protocol was established prior to the start of data collection and was reviewed and approved by this study's dissertation committee.
2. The semistructured interview was field tested on people who are Clery Act facilitators at an adjacent institution to the study site. These people were not participants in this study.
3. The researcher transcribed interviews to maintain proximity to the data.
4. The researcher experienced prolonged exposure to the study site to ensure submersion in the phenomena

5. Transcripts were hand coded to maintain proximity to the data.
6. Transcripts were hand coded multiple times to ensure that the results were dependable.
7. Transcripts were provided to participants for member checking, so they could determine and confirm accuracy of the account. Participants had the option to clarify, add, or redact transcribed information (see Appendix C). Interview data was triangulated with observation and artifacts to ensure credibility.
8. Thick description was used to document the study so that the phenomena were engaging and understandable to a wide range of people.

Expected Findings

The literature review established that many facilitators were unaware of the Clery Act's complete mandates, and that there was a general misunderstanding of the intent of the policy and a communication deficit among departments as administrators managed individual aspects of the Clery Act. It was anticipated that the results of this study will add depth to available research by providing a richly detailed portrayal of Clery Act policy implementation at one institution. Although these results will not be generalizable, they will act as an impetus for future researchers to conduct similar inquiries at other institutions.

Ethical Issues

Stake (1995, 2010), a forerunner of modern case study research, once reflected that, “I had come to suppose that it is not ethically problematic to overhear intimate facts about people. I had thought our ethical obligation was a matter of avoiding improper use of what we learn” (1995, p. 59). Stake’s (1995) words draw attention to the fact that researchers may not always be able to control *what* they hear and see, but that they can minimize risk by controlling *how* they

use their knowledge. In the spirit of ethical obligation to the field of research, there are strategies that researchers should employ to mitigate harm and risk to participants.

Conflict of interest. Conflict of interest between the researcher and the participants in this study was minimal; the researcher does not directly work with the study pool. Conflict of interest involving the researcher and the institution was higher because the researcher is employed at the site institution. This case study intended to provide, with full transparency, a detailed portrayal of Clery Act policy implementation strategies at one institution. The study was not designed to negatively or positively assign value to the institution or policy facilitators.

Ethical issues. In this intrinsic case study ethical issues were first mitigated by gaining approval from the Institutional Review Boards at both Concordia University and at the site institution. Next, a participant consent form was provided so that subjects understood their rights (see Appendix B). These rights included complete research transparency, voluntary participation that could be rescinded without notice or explanation, confidential interviews that participants were given the option to review, annotate, and/or revoke (see Appendix C). Additionally, the site institution was deidentified, and pseudonyms were assigned to the participants to maintain anonymity and confidentiality.

Summary

The methodology for this study was developed to address gaps in available Clery Act research. Case study was deemed the most appropriate way to accurately portray facilitator strategies and perceptions as it allows for multiple means of data collection. Narratives derived from the interviews offered thick descriptions and insight into the methods employed by Clery Act administrators at the site institution. This study was designed as a single institution, intrinsic case study based on a constructivist paradigm, and data was collected through recorded

interviews, observation, and triangulated with artifacts. The two load bearing research questions were developed to provide richly detailed responses, and semistructured interview questions were designed to invite conversation and reflective response. To maintain data security and to ensure researcher proximity to the data, the recorded interviews were transcribed by the researcher and hand coded using a standardized set of procedures. This intrinsic, single institution case study triangulated credible and reliable data via interview, observation, and artifact in the hope that other researchers will construct similar studies that further our knowledge of Clery Act policy implementation.

Chapter 4: Data Analysis and Results

This intrinsic case study sought to provide a detailed capsulation of Clery Act policy implementation at a multicampus, public university. Data for this research was collected via interview, observation, and artifacts. Codification of these data points was heuristic; *a priori* codes were created based on elements relative to the research questions (see Appendix D). New codes were identified after the first round of coding. Different coding methods were tried, and process coding was determined to be the most effective means to code data. From the data corpus emerged categories, themes, and codes that revealed common strategies implemented by Clery Act policy facilitators.

The importance of the data is threefold. First, Clery Act policy mandates that all universities participating in federal financial aid programs remain compliant with specific regulations (U.S. Department of Education, 2016), but these regulations are less explicit about the manner in which institutional facilitators achieve these outcomes (Wood & Janosik, 2012). Second, policy noncompliance can result in the Department of Education assigning damaging fines and penalties to an institution; this could potentially include the complete revocation of an institution's ability to participate in Title IV programs (Carter, 2017; Winn, 2017). Therefore, understanding how Clery Act administrators at one institution facilitate policy compliance and describe their roles can offer valuable guidance for administrators at similar institutions. Lastly, the presentation of effective campus safety strategies at one institution could assist other institutional administrators as they approach ways to mitigate campus crime and increase safety on their campuses.

This study focused on the strategies that Clery Act facilitators at the site institution use to implement policy requirements, and the ways that they describe these strategies. Participants in

this study included Clery Act compliance officers and Title IX coordinators who worked in a variety of positions at the site institution. Interviewees discussed their Clery compliance strategies and collaborative strategies; some of these strategies were implemented at the campus level while others were facilitated on a larger scale as part of institution-wide efforts. This chapter serves as a presentation of the data, including collection and analysis, and the findings of the study. It is organized as follows: a description of the sample population, an analysis of the research methodology, a summary of the coding and theme development, presentation of the data and results, and concluding remarks on the main points of the findings from this case study.

Research Questions

Two research questions directed the case study:

RQ₁: What strategies do Clery Act facilitators at a public university use to implement the policy?

RQ₂: How do facilitators at a public university describe their Clery Act implementation strategies?

Description of the Sample

The researcher explored individuals who served in roles that supported the site institution's Clery Act compliance efforts. The nine people who agreed to participate were drawn from each of the site institution's campuses. In this study, all the institution's campuses were represented. Five females and four males provided interviews and represented a wide range of professional roles at the site institution. This diverse study sample was composed of people who worked in departments such as campus police, campus operations, general counsel, housing and residential life, human resources, and student life. The participants were either Clery officials, campus security authorities (CSA), or Title IX coordinators. These titles

represent the distinct levels of focus that the participants' professional responsibilities entailed regarding Clery policy implementation. These levels of focus will be discussed further in this chapter.

Clery Officials, Campus Security Authorities, and Title IX Coordinators

Some of this study's participants hold positions that require daily attention to Clery requirements, while others are less actively responsible and might only work with policy requirements sporadically, or on a monthly and annual basis. The Department of Education (2016) acknowledges three distinct levels of Clery Act responsibility: Clery official, campus security authority (CSA), and Title IX coordinator. People with these titles all support Clery policy implementation and promote campus safety. Many of their obligations overlap, especially in policy compliance areas such as reporting and training.

Response Rate

Twenty-four people were emailed an invitation to participate in the study, and five people responded immediately to schedule an interview. Two weeks later, a second round of invitations was sent to those people who did not respond to the first email; and from this request, two more people agreed to participate. Additionally, from the second-round invitation, two other people responded with questions about the study and agreed to provide an interview once they understood the scope of the research. Once a positive response was received, an interview was scheduled, and a consent form was emailed to the participant along with a copy of the interview questions. This study had a zero dropout rate.

Participants

Each of the nine people who agreed to participate in this study supported Clery Act compliance in myriad ways. Some of the participants are Clery officials; these people possess a

higher level of responsibility responding to campus crime and managing reportable Clery Act statistics. These individuals work for the institution's campus police department, campus operations, or office of legal defense. Other participants are Title IX coordinators, and although their level of responsibility might outwardly appear less, their role in supporting Clery Act compliance is extremely important. The Title IX coordinators who participated in this study worked in the institution's departments of human resources and student life. To succinctly explain the difference between the two types of participants: The Clery Act is a primary focus for some of the participants, while for others it is a smaller portion of their overall responsibilities. Of note is the fact that at the site institution there is a wide variety of people who support Clery compliance and these people collaborate to ensure compliance and campus safety.

The following list of participant descriptions provides an overview of the participants' professional responsibilities at the site institution and their involvement in supporting the institution's Clery compliance efforts (participants were de-identified using pseudonyms to maintain confidentiality):

Table 2

Clery Act Case Study Participants

Name	Title/Department	Description
Barbara	Title IX Coordinator	At the time of the interview Barbara was new to her position at the site institution. She was building an understanding of how her position supports Clery compliance.
Ben	Compliance Officer	Ben's position was created specifically to support campus-wide Clery Act compliance; it is the primary focus of his job. He provides compliance oversight for all the system campuses.
Johnny	Residential Life and Security	Johnny supports his campus' safety operations and Clery compliance; he takes immense pride in the safety of his campus.
Judy	Title IX Coordinator	Judy stressed the importance of her position's responsibility to raise awareness concerning issues of campus safety. She proactively seeks to mitigate sexual misconduct on her campus.
Karen	Title IX Coordinator	Karen's position demands rigorous attention to detail, and her focus is on both policy compliance and campus safety. She is involved in the facilitation of safety training at the site institution.
Nicole	Title IX Coordinator	Nicole has worked in positions where Clery compliance was of primary concern. She works in student life, and her current position requires monthly Clery reporting. She works closely with many departments to support campus safety and Clery compliance.
Patricia	Title IX Coordinator	Patricia works in student life and expressed that Clery reporting helps her campus track safety statistics and respond accordingly. She has been a member of work groups that explore the best ways to follow through with Clery mandates.
Roger	Campus police	Clery compliance is a focus for Roger. He manages all his campus's security authorities. On his campus, he is the "go-to" person for all questions regarding Clery compliance and security.
Tom	Campus police	Tom is deeply invested in the Clery Act and its requirements. He was catalyst in the formation of the site institution's creation of a centrally located, system-wide Clery compliance officer position (Ben currently holds that position). Tom seeks to find new ways to ensure that his campus is safe and promotes the importance of education and prevention to mitigate campus violence.

Research Methodology and Analysis

Case study. Case study research was identified as the most applicable approach to explore how administrators at individual institutions are implementing Clery compliance strategies and to present the ways that they describe their roles supporting policy compliance. Qualitative case study was deemed most optimal for two primary reasons. First, it provided a means to examine multiple sets of data that provide an understanding of points of intersection that may not have been previously connected. Second, case study allowed an opportunity to present a rich portrayal of the ways that institutional administrators facilitate their duties. Details that emerged from such a rich portrayal offer a depth of strategy description for administrators at similar institutions to use to examine their practice and thereby develop effective Clery Act compliance strategies. Transferability of policy implementation strategies creates pathways of knowledge and increased effectiveness.

Methodological necessity. There is a demonstrated need for more research on ways institutional administrators facilitate Clery compliance. The literature review revealed that there were significant gaps in Clery Act research (Gregory & Janosik, 2012), including a lack of studies that examine single institutional implementation strategies and policy practice (Gregory & Janosik, 2012). The Clery Act is composed of extensive mandates ranging from reporting requirements to timely warning notifications, but there is lack of specific guidance on the strategies that institutional administrators should use to achieve compliance (Gregory et al., 2016; McNeal, 2007). Additionally, the policy continues to evolve and expand, and non-compliance fines continue to increase exponentially (Carter, 2017; Winn, 2017). Succinctly stated, every institutional administrator employed at a university that participates in federal financial assistance programs should be invested in Clery Act compliance research.

Methodological Strategies

The methodological approach of this study triangulated three types of data: artifact, interview, and observation. This ternion was chosen to increase confidence in the data. The bulk of the data were obtained through interviews. Artifacts and observation were also analyzed to ensure the validity of the data.

Artifacts. Artifacts for this study included each of the research site campus's Annual Security Report (ASR) and the daily crime log from each campus. Also, a few participants provided items such as form letters or training materials. All these artifacts were analyzed through a lens framed by this study's research questions and theoretical framework. Artifacts were analyzed, but not coded.

Interview. Interviews became the primary point of data collection. Seven questions (see Appendix A) were intentionally constructed to gather information about participants' Clery compliance strategies and their perception of ways they support Clery compliance. Data from the interviews were collected in person, by phone, and via the use of WebEx. Interviews were audiotaped or recorded using WebEx and transcribed by the researcher to ensure proximity to the data. Next, the transcripts were hand coded multiple times using pen and highlighter. Codes were written on the right-hand margin of the transcript, and important quotes were highlighted. Codification of these data points was heuristic; *a priori* codes were first created (see Appendix D) based on elements relative to the research questions. Different coding methods were tried, and process coding was determined to be the most effective means to code necessary data points. New codes emerged during the first round of coding, and further expanded during the second and third round of coding.

The interviews were designed to be unstructured and conversational. This was intentional to provide a greater comfort level for the participants. Before the interview, all participants were provided with the preset list of questions to ensure that specific points of data would be captured. Interview questions were asked in the same manner and with the same words for every participant. Some of the interviews were short, and others lengthy. It could not be determined if this was due to the participant's personality or level of participation in Clery compliance. Every participant answered all questions; yet, as conversations naturally progressed other questions emerged. There were surprising conversations and enlightening facts that may seem extraneous, but ones that vigorously contributed to the research. These facts are analyzed in the section devoted to unanticipated findings. Furthermore, conversational questions and the data collected from participant response were integrated into the overall data corpus.

Observation. Visual observational data was included when possible. Of the nine interviews, only four allowed for visual data. In the four instances of in-person interviews an observational data report was completed and analyzed to discern pertinent information. Due to the scarcity of observational data, the observational notes were analyzed, but not coded.

Methodological Issues

The following items were documented deviations from the initial protocol proposed in Chapter 3. These documented deviations did not impact the trustworthiness or validity of the data. Nor did these deviations compromise the anonymity or welfare of the participants.

Sample size. Originally, this case study was designed to collect data from only one small campus of a large, multicampus university. Fifteen people were initially invited to participate. Issues first arose when some of the invited people expressed hesitation about being included in the study. At the time, their disinclination was not wholly understood. Three of the initial

invitees responded by directing the researcher to their campus's Clery official. A meeting with the system campus's Clery official helped him better understand the focus of the study, and he communicated a "go-ahead" to the other invitees. After that, there was a surge in scheduled interviews. The resulting sample size was comprised of nine Clery Act facilitators, and all the institution's campuses were represented.

Another issue that arose was the availability of invited people to participate in the study. The first scheduled interview for the study was with one system campus's Clery official; he was extremely helpful and eager to forward Clery Act research. He volunteered that his campus had made great strides in Clery compliance and had spearheaded the hiring of a Clery Act Compliance Oversight Officer on the main campus. However, he alluded to the fact that his patrol officers would not be available for interview. Out of respect for his wishes, this led to the removal of seven people from the invited participant list. In juxtaposition, he connected the researcher with the site institution's newly hired Clery Act Compliance Oversight Officer. From that connection, new interviewees were identified. The Clery Compliance Oversight Officer provided the names of three more people to invite for interviews. Therefore, it was from the first interview that a participant flux was noted; the study both decreased and increased in size and scope.

Interview. The initial interview protocol was based on the consideration that all interviews would be locally conducted and in person. Once the population was expanded to include all the site institution's campuses, WebEx was chosen as the most appropriate platform to collect data. The researcher has a secure account with WebEx, and it was available for use by all the study participants. However, every participant interviewed via WebEx opted not to use the video function.

One participant who agreed to interview via WebEx had difficulty using the online platform. That interview had to be rescheduled and was eventually conducted by phone. To collect data from the rescheduled interview, the researcher called the participant from a private office and placed him on speaker, and the conversation was recorded with the same handheld recording device used to collect data from in-person interviews. Based on the success of this first hybrid interview method, other interviews were also conducted in this manner when in-person interviewing was not an option and the interviewee opted out of using WebEx's online platform.

Observation. As noted, the study was initially designed to collect data from one campus of a large, public, multicampus institution. Upon approval by Concordia University's review board, the population size was expanded to include Clery Act facilitators from all the institution's campuses. Due to the institution's expansive geographic range, WebEx was identified as the best means to conduct interviews that could not occur in person. The site institution has a secure account with WebEx, and it was deemed available for use by all study participants. Primarily, WebEx was established as a rigorous way to collect data because it provides the option to collect both audio and video data. However, none of the WebEx participants agreed to use the video option. The two participants who chose to provide interviews via WebEx recused themselves from the video feature.

Artifact. One identified issue in the collection of artifacts was the availability of items provided between types of interview methods: in person versus phone or WebEx. In-person interviewees provided artifacts such as form letters and brochures that supplanted the online items retrieved from each campus' website. Those participants who were interviewed via phone or WebEx did not offer artifacts for use in the study.

Summary of Coding and Theme Development

Codes. Data analysis began with an examination of interviews. Participant interviews were hand coded four times to ensure accurate analysis and data validity. Process coding was used to capture the active nature of strategy implementation. Saldana (2016) explained that this method is also called action coding and employs gerunds to code processes of human activity. It can be especially applicable for coding small-scale projects that involve interaction or implementation.

The researcher's approach was heuristic; and with each instance of coding, emerging codes became more rigorous and well defined. From these data points, themes were created that documented participants' strategy implementation actions. The first round of interview coding began with a set of *a priori* codes based on Saldana's (2016) process coding approach. There were seven *a priori* codes: Implementing policy, perceiving policy, training, reporting, collaborating (with other departments/stakeholders), assessing outcomes, and complying.

These first codes were constructed based on an extensive review of Clery Act literature. The organization of the literature review established common Clery Act actions and perceptions that were synthesized to identify possible codes. The *a priori* codes served as an initial launch into coding the data, and from that first set of codes emerged a more refined set of process codes that were ultimately used in the final rounds of coding (see Appendix E).

Categories and Themes

The final codes (see Appendix E) represented data that were assigned to three primary categories: Clery Act Policy, Facilitator, and Overlapping Functions. These categories included themes that organized the coded data. Note that the first category, Clery Act Policy, has a third set of codes that were not easily summarized in Table 3. This third theme was limited to

institutional resources that were coded with the concepts of budget and human capital. Table 3 summarizes this study's final categories, themes, and codes.

Table 3

Summary of Categories, Themes, and Codes

Category	Themes	Theme: 1 Codes	Theme 2: Codes
Clery Act Policy	Compliance strategies, policy development, and resources	Compliance strategies: Coding crime, Collaborating, Protecting consumers, Promoting safety, Reporting, Training, Timely warning, Threat assessment, Promoting campus safety, Raising stakeholder awareness	Policy development: Contextualizing, Developing social attitudes (policy evolution), Promoting campus safety (progression of)
Facilitator	Describing duties/role, Perceiving policy (facilitator)	Describing duties/role: Assessing practice/assessing outcomes, Changing strategies (responsively), Collaborating with others (departments/stakeholders), Raising awareness, Training, Promoting campus safety	Perceiving policy (facilitator): Contextualizing, Describing policy, Draining resources, Developing social attitudes (policy evolution), Perceiving value (duties, policy, & outcomes), Questioning policy
Overlapping functions (Clery Act & Title IX)	Compliance strategies, Facilitator perception	Compliance strategies: Training, Reporting, Collaborating, Supporting victims, Promoting campus safety	Facilitator perception: Assessing practice/assessing outcomes, Changing strategies (responsively), Supporting victims, Promoting campus safety

Of note is the fact that specific codes were identified in multiple categories and themes.

For example, the code collaborating defines the process of facilitators collaborating with

colleagues and stakeholders. This code occurs in the category Clery Act Policy under the theme compliance strategies. This code was also determined relevant to the category Clery Act Policy within the theme describing duties/role and again is in the category overlapping functions (Clery Act & Title IX) in the theme Compliance Strategies. Another example of actionable items coded across multiple themes is the code promoting campus safety. Promoting campus safety occurs in every theme.

Artifact and Observation

Artifacts. Artifacts and observation notes were used to triangulate data obtained by interview. For example, each campus publishes its Annual Security Report (ASR). Many of the participants referred to their campus ASR when discussing their policy implementation strategies or perceptions of campus safety. Others discussed brochures or standardized communications that have been effective in implementing policy requirements. These artifacts were examined to determine if there was evidence to support the participants' statements. Observational notes, when available, were used to provide richer context and understanding of how the participant was situated in the case study.

Artifacts were reviewed to determine if there was evidence to support interview data. These items were analyzed through a scholarly reading lens but not coded. The primary artifacts were ASRs from each campus, and each ASR is approximately 50 pages. In addition to the ASRs, campus specific Clery maps and daily crime logs were reviewed. One participant provided a standardized letter that was used to communicate with off-campus Clery locations. Another participant shared a small, informational brochure that her office gives to victims of sexual assault. At the time of the interview, the brochure was being updated and so was not

physically given to the researcher; however, the participant extensively explained the brochure and its importance.

Observation. Observational data were collected when available. Of the nine interviews, four allowed for the collection of observational data. In some instances where the interview was conducted via telephone, vocal inflection was noted. There were times when participants’ obvious excitement and passion for their work was documented. In contrast, there were times when a participant’s voice reflected frustration or unhappiness with Clery Act policy regulations. Observational data was analyzed to triangulate information obtained from interview and artifacts. A summary of artifact and observational data collection can be found in the Table 4.

Table 4

Summary of Artifacts & Observation

Participant	Artifacts	Observation
Barbara	Campus specific ASR and daily crime log, no additional artifacts gathered during the interview.	Observational data collected.
Ben	Campus specific ASR and daily crime log, no additional artifacts gathered during the interview.	Observational data not available.
Johnny	Campus specific ASR and daily crime log, no additional artifacts gathered during the interview.	Observational data not available.
Judy	Campus specific ASR and daily crime log, no additional artifacts gathered during the interview.	Observational data not available.
Karen	Campus specific ASR and daily crime log, no additional artifacts gathered during the interview.	Observational data collected.
Nicole	Campus specific ASR and daily crime log, allowed researcher to view in-progress brochure created to support victims of sexual assault.	Observational data collected.
Patricia	Campus specific ASR and daily crime log, no additional artifacts gathered during the interview.	Observational data not available.
Roger	Campus specific ASR and daily crime log, no additional artifacts gathered during the interview.	Observational data not available.

Participant	Artifacts	Observation
Tom	Campus specific ASR and daily crime log, provided form letter used to support Clery compliance of off-campus geographical locations.	Observational data collected.

Presentation of Data and Results

This intrinsic case study was guided by two research questions that sought to determine what strategies administrators at a public university use to facilitate Clery Act compliance policy and how they describe their implementation strategies. In keeping with the goal of the research, seven interview questions (see Appendix A) were developed to gather pertinent data. As was noted previously, the participants worked in a wide variety of departments and were geographically located on campuses spread throughout the state. All the participants shared a common denominator: A sincere desire to promote campus safety and ensure that their institution remained compliant with Clery Act policy requirements. This section presents collected data and determined results that supported the study's two research questions.

Implementing policy. This study's research questions focused on the specific strategies that the Clery Act facilitators at the designated site institution use to implement policy requirements, and the ways that they describe these strategies. Participants in this study included Clery Act compliance officers and Title IX coordinators who worked in a variety of positions at the site institution. Interviewees discussed their Clery compliance strategies and collaborative strategies. They detailed strategies that were created at the system-campus level and ones that were collaboratively designed as an institution-wide effort.

From the data, it was determined the study's participants primarily focused on strategies that support the Clery Act's reporting requirement and safety awareness training for the campus community. The Clery Act's timely warning requirement was mentioned by several participants

who held positions that were more likely to be involved in the implementation of that process; however, there were a few participants, whose primary professional obligation was not involved in timely warning, who highlighted the strides their colleagues had made in improving this critical process. Those participants who were most apt to be responsible for timely warning communications were also more likely to discuss campus safety in relation to consumer awareness.

Other participants, whose professional duties were more focused on supporting enrolled students, described strategies that gravitated toward promoting campus safety and victim rights. As the interview process continued, it became clear the difference and similarities of the participants' professional roles. Some people mitigated campus crime while others worked extensively with cases of crime after the crime occurred. But all the participants were focused on their obligation to report crime. All were intentional in their part to create safer campuses. The following are themes identified through data collected from participant interviews.

Reporting. Interviewees described in detail the strategies they employed in their daily duties and spoke at length of the ways that they worked with other departments and outside stakeholders to achieve campus safety goals. Across the board, every participant noted that they considered strategies that supported the Clery Act reporting requirement to be one of the primary things they did to facilitate institutional compliance. The Clery Act reporting requirement is a focal point for Clery Act compliance, and it dictates that every institution participating in federal financial aid programs must maintain and disclose their daily crime statistics, as well as publish an Annual Security Report (ASR).

Participants who identified their duties as supporting roles to Clery compliance efforts typically discussed reporting strategies that worked in collaboration with their campus's

designated Clery officer. To illustrate, Nicole, a participant who supports the efforts of the Clery officers explained that,

Every month I'm responsible for reporting to our campus PD and their stat compilations for the ASR, and so all of the students who are involved in a disciplinary referral for a Clery crime, are then de-identified and put into a data sheet that I pass along.

She also noted that in addition to the monthly report she shares with her campus's Clery officers, more serious crimes were immediately reported for threat assessment if the situation warranted an emergency response. Another participant, Karen, explained that her area provides data for her campus's Annual Security Report, and opined that it is "really a valuable, informative document for our campus." She also enthusiastically praised the efforts of her campus's Chief of Police, noting that, "He's done amazing work with the Annual Security Report."

Nicole and Karen work in the same administrative unit, and their office offers confidential reporting options for students who have been victims of crimes such as sexual assault. Nicole explained that she has an open door policy and that students are given a safe place to report crimes. This is important as there are instances when a victim might not feel comfortable reporting a crime to the campus police, and it is in such instances that a supportive environment will be more effective to advocate on the victim's behalf. She also noted, "There's also not a statute of limitations. I've taken reports just the day after something's happened; I've also taken reports two years after something's happened, so they (the victims) set the pace."

Participants who identified their primary job duties as Clery-related were more apt to detail the intricacies of the policy's reporting requirements and the more complex strategies necessary to ensure accurate reporting. For instance, Tom described the ways that his

department works with both internal and external stakeholders to report Clery crimes. At the internal level, he coordinates providing crime statistics from his campus to a campus-wide database. Maintenance of these statistics requires that Tom works with each administrative department and collegiate unit on his campus. Karen, who works on the same campus, described that she serves on a small Clery advisory committee that Tom convenes annually. The committee is designed to determine ways that collaborating groups can assist Tom's department in their reporting efforts.

Off-site reporting strategies. Clery officers remarked on the policy's complex off-site reporting requirement and how difficult it is to maintain when working at a large institution. Ben explained that an off-site crime is minutely defined and classified. The geography of the campus is of utmost import when determining if a crime is reportable:

A property owned or controlled by the university that's not immediately adjacent or contiguous to your main campus or its property owned by a recognized student group. So, this could be a fraternity house that's a block away from your main campus; it could be a research field that's 200 miles away from your campus.

This one detail of the Clery Act especially impacts institutional administrators who support Clery Act compliance at large institutions. Consider every research facility or each place where the institution employs people to act as an outreach. Every off-site athletic event is also an area of reportable crime. If one was to imagine all the off-site locations of a multicampus institution, it is almost boggling to comprehend the number of places where reportable crimes could occur. These issues further confound an administrator's approach to coordinating and documenting campus crime correctly.

At the individual campus level of a multicampus institution off-site reporting can be challenging. Tom, on his campus, coordinates the crime statistics retrieved from off-site locations. He noted this aspect of the reporting requirement requires he work with external stakeholders to gather statistics that are entered in the institution's crime database. He explained the first part of this process entails a detailed maintenance of a list of off-site locations. He works closely with Ben, who serves as the institution's centralized Clery compliance oversight, to annually identify properties the university owns and controls away from his core campus. These are locations where there is no university staff trained in Clery to report that information directly to him. Tom next works with the police departments that have authority in these off-site areas and will send letters on an annual basis requesting disclosure of any Clery-related crimes near the institution's reportable locations. Tom summarized by stating:

We have those properties all over, so we have to communicate and educate those agencies that are responsible for law enforcement on those properties that they have control of. We have to educate and get that information from them.

Crime classification. Clery officers noted that the policy's complex crime classification system was not easy to navigate for those who did not work with it daily. All the site institution's Clery officers stated that one of their duties was to assist others on their campus in determining the correct crime classification for obligatory Clery Act reports. As one participant noted, "It's like a language, you know. If you don't use it you lose it, right?" The site institution's campus-wide reporting database was created in part to alleviate challenges associated with classifying Clery crimes and to maintain the consistency and integrity of statistics classifications. This innovative strategy was spearheaded by Ben, who serves as the institution's centralized Clery compliance oversight. Ben explained that ". . . if we can get

consistency across the system at least we know that we have comparable data within our system because the crime classifications are being made consistently.”

Training strategies. Within the context of Clery Act requirements, the process of training specifically addresses the process of educating not only the designated campus security authorities (CSA) in crime response and reporting techniques but also educating the entire campus community. All the participants indicated that training strategies were another important Clery related process that they facilitated. Some of the participants described training as a major part of their professional duties, while others touched on the importance of training on their campus.

Advanced training strategies. Tom explained that his entire department is specifically trained in the elements of Clery. He noted, “There's basic Clery knowledge at the patrol level, and then our supervisors have the advanced Clery Act training.” He explained that advanced Clery Act compliance training is contracted through Dolores Stafford, a privately-owned company that focuses on Clery Act training. Another participant, Nicole, stressed the importance of advanced training both on campus and off. She described how she has seen a growth in available training for Title IX facilitators, and ways that the trainings have expanded from short workshops to weeklong conferences for administrators who facilitate campus safety and Title IX programming. Nicole also highlighted the fact that there has been a recent surge of professional organizations created for administrators of Title IX policy.

Campus community training. Karen, a Title IX coordinator on one of the system campuses, is actively involved in coordinating training on the same campus as Tom. She described at length the training strategies employed by her campus. Karen explained that training is provided via an online platform contracted through a partner company, Everfi. This

training uses a research-based approach to campus safety. She noted that it is extremely attractive because it also provides an assessment component so that facilitators can evaluate learning and impact. She expressed that it was a great process, and further elaborated:

It (the training tool) has two components. The first component is completed before school starts. And one thing that we really like about it is there are quizzes throughout that you have to complete, so you have to demonstrate mastery of the topic before you can complete the module. And so we get a sense of what our students are learning, because we get the results from those, those online module quizzes, to know how the student's scored. And they have to score a certain percentage before they can check the box that they've completed it. And then six months later, there's a repeat assessment that sort of asks questions about how it's impacted your behavior and does again some gathering back of information to make sure they learned what we hope they learned.

Judy corroborated the excellence of the recently implemented online training modules and commented that her campus supplements these with in-person campus safety workshops for staff and faculty. Karen's campus also facilitates rigorous in-person training sessions throughout the year that focus on specific aspects of safety training such as violence prevention and sexual assault prevention.

Another participant, Nicole, stressed the importance of training both on campus and off. She described how she had seen a growth in available training for Title IX facilitators, and ways that the trainings have expanded from short workshops to weeklong conferences for administrators who facilitate campus safety and Title IX programming. Nicole also remarked

that there had been a recent surge of new professional organizations created for administrators of Title IX policy.

Timely warning. One important Clery mandate requires that timely warning notifications will be issued to the campus community in specific instances of serious crime. However, the policy does not explicitly state the definition of what constitutes timely, nor the way these warnings should be issued. Nor does the policy expressly indicate what information should be conveyed to the campus community. This mandate was worded in a way that allows institutional administrators the ability to create a safety response process tailored to the needs of their campus. Participants in this case study indicated that timely warning strategies on their campuses were primarily facilitated by their Clery officers. Ben, who provides system-wide oversight for Clery compliance, stated that he consults with all the system campuses on the need to issue a timely warning. He explained that once a Clery officer is made aware of a crime, he assists with assessment, “to see if there's a serious or ongoing threat to the campus community, figuring out the best ways to communicate that information to the community so it may help prevent the occurrence of similar types of crime.” The site institution typically delivers timely warnings via email and they test the process annually. Ben also offered that new ways to issue timely warnings are being examined to ensure they are delivering information correctly and in the most efficient way possible. Ben noted that facilitators at his institution:

Agonize a lot about sending them out because we don't want people to be fatigued. You know we don't want people to start disregarding them. From what I've heard, you know, people really appreciate getting the information. It keeps people informed and I think that's one of those things that not only people are appreciative of, but I think it has a tangible impact on the safety of the campus

because there's no doubt in my mind that that information can help prevent similar occurrences of crime.

Ben's concern is understandable. Knowing when to send out mandated timely warnings is critical in instances of heightened emergency, but even more important is communicating these notifications in a way that effectively alerts the attention of the campus community.

Discernment and practical knowledge are necessary to create compelling communication strategies.

Off-site timely warning. Tom continued conversation on this topic by describing challenges associated with issuing timely warnings to university areas that were not centrally located to the campus. He highlighted the fact that his department had to remain vigilant in obtaining information from other police departments so that if a timely warning were necessary at an off-site location, he could respond quickly to ensure the safety of students and staff at those locations. One strategy he acknowledged was keeping open lines of communication between his department and responsible parties at the off-site locations to ensure that they are aware that the property is controlled by the site institution. He annually sends a letter to each of the police departments he works with, so they have an updated list of the site institution's properties.

Promoting campus safety. One participant in this study, Tom, summed up the Clery Act with these words:

It's partly safety policy and partly consumer awareness, but the spirit of it, the intention of it, is to give prospective students and employees knowledge ahead of time to disclose crime statistics and to let them know policies and procedures on campus are to keep individuals safe and also to know what some of the crime data for the campuses are.

The Clery Act was initially created as a consumer protection policy, and through the years it has evolved to encompass many facets of campus safety. Participants in this case study described a variety of strategies used to achieve these goals. Already discussed in this chapter was the importance of training to promote safety and mitigate violence. In addition to training, participants noted that on each of their campuses they were facilitating programming to mitigate violence and raise awareness about campus safety. Some of these programs were delivered during new student orientation or as monthly safety themes to raise campus community awareness about safety. These programs consisted of safety awareness posters and brochures prominently displayed in high traffic campus areas and informational articles sent via the community's online portal. Participants agreed that these efforts had made a positive impact on reducing campus crime and encouraging more instances of victim self-reporting.

Supporting victims. Additions to the act address necessary requirements to support victims of campus crime and violence. One participant, Nicole, noted that cases of this nature included, but were not limited to, bullying, data violence, hate crimes, sexual assault, and stalking. Her approach to supporting victims begins by sending the victim a letter of support and inviting them to meet with her. If they choose to meet with her, they are provided with a small brochure that was intentionally designed to be discrete and easy to hide so that victims do not feel "outed" while they are reading it. The brochure outlines victim support options and available resources both on and off campus. Karen, who works on the same campus as Nicole, stated that "We're certainly trying to create a scenario where students understand that first and foremost, they're going to get support." She indicated that one emphasis on their campus is to reduce barriers and encourage reporting.

Other participants discussed supporting victims regarding the manner that their staff is trained to respond to situations. For example, Tom explained that his patrol officers are trained to respond in ways that support the victim and that they know the information to give to victims. On another campus, Johnny discussed the value of confidentiality and the importance of respecting the victim's right to maintain anonymity.

Consumer protection. All the participants touched on consumer protection as the foundation of Clery Act policy. As Tom noted, "the spirit of the Clery Act is to ensure that campuses are doing everything that they can to keep campuses safe, and it's also a compliance component. It's partly safety policy and partly consumer awareness." More than once during Tom's interview, he stressed the value of the policy's consumer advocacy regulations and its goal of providing transparency regarding the safety of the campus so that potential students and their families can make informed decisions. However, some facilitators also lamented the lack of awareness that most consumers have to the availability of campus crime information. Participants described strategies to get the information in the hands of the consumers and how they endeavored to raise awareness of available crime statistics. Ben stated:

I've tried to get more interest in people pulling up the annual security report and looking at the information, and the institution spends a lot of time getting the information and putting together a product that's useful but if people don't know it's there, don't know what it contains, then they're less likely to access it. So, that's one thing I work on.

Tom, the Chief of Police on one of the institution's smaller campuses, works with Admissions and New Student Orientation to put the necessary information directly in the hands of potential students and those students who have already committed to attend. He noted that it was not as

easy as it sounds because of the variety of application types such as freshman, transfer, and graduate.

Assessing practice. Integral to Clery implementation were data that revealed the importance of assessing strategy effectiveness. Especially when discussing training strategies, participants revealed that they were constantly evaluating ways that the content was delivered and the ways it was increasing safety awareness and community participation. For example, innovative online training delivery was implemented and has demonstrated an increased awareness of sexual assault prevention. Karen expressed that the software company provides a research-based approach that has been an extremely good fit for her institution. She noted before that, all training was conducted in person, but this new platform allows opportunities for follow-up assessments that allow her office to gauge if the training has impacted the trainee's behavior.

Unanticipated Findings

In addition to the necessary data collected to answer the research questions, unanticipated findings were also revealed. These findings emerged during the analysis of participant interviews. Participants vocalized similar perceptions and mutual thoughts that were determined to be relevant to the study of Clery Act policy implementation. Although these unanticipated findings were secondary to the intent of the study, the prevalence of these themes is worth consideration.

Increased victim reporting. Two participants touched on an emerging, significant concept. Karen and Judy, Title IX coordinators employed on two separate campuses of the site institution, stated that there had been a rise in reports of sexual violence. However, both accurately pointed out that this did not reflect an increase in incidences but indicated the

effectiveness of institutional efforts to raise campus awareness about sexual assault and victim rights. Karen eloquently explained the situation:

Reports are up, and I count that to be a good thing, because it's the most under-reported issue . . . we think about sexual assault, sexual violence. I would say it's the most underreported issue not only on campuses, but in our society. So, one of our emphases over the years that I've been here is to try to reduce the barriers and encourage reporting. So, we actually see reporting going up as a positive, because we think it was very underreported previously. So, can I say I've seen conduct change? No, not necessarily. I don't believe there are more incidents, but I do believe we've sort of taken the shroud off.

Judy corroborated this fact by noting, “More incidents (are being) reported, not that we have more incidents, but more are reported.” The rise in victim self-reporting and bystander reporting demonstrates that administrators at the institution are making headway to change attitudes and raise awareness at their institution.

Policy evolution. One set of interview questions directly asked participants: Have you witnessed a change in the manner that the policy is implemented? If so, what are these changes? How do they affect your practice?

A few people reported that they had not witnessed any changes to the policy or implementation practices and attributed this lack of insight to the fact they were new to their position or new to the field of Clery compliance. However, most participants expressed that they had witnessed changes in the ways that the policy was implemented at their institution.

This latter group of respondents credited a variety of reasons for noticeable changes in policy implementation. Nicole had much to say about this topic. She offered that developing

attitudes in higher education regarding student accountability was one component of the changes, and she added that better training and the availability of resources were other contributing factors. Nicole also pointed out that within the past few decades there has been a rise in the number of professional organizations that support the efforts of policy facilitators. The increase in these types of professional organizations further demonstrates rising national awareness and deepening conversations around Clery topics such as sexual assault and campus safety. Lastly, Nicole pointed out an item that no other participant identified. She highlighted that changes in the policy advanced fair, impartial proceedings so that both the accused and the accuser are granted the same considerations and due process.

Ben, a Clery official, opined that since the inception of the Clery Act the basics have not changed. He recognized that the policy's effectiveness has long been debated but added that since 1990 valuable components had been added to the policy such as emergency notification and timely warning requirements. Johnny, a participant who works on one of the institution's smaller campuses, agreed that the Clery Act's focus had not changed much. He added that the new requirements insist that facilitators be responsive to meet policy demands.

Other participants had differing viewpoints. Patricia stated that significant changes to Clery policy had created national conversations about campus safety. She said, "The fact that people are even talking about it is new. I just think in the past it was more . . . well, just box checking. You know, like, let's just get this done. No big deal." Roger weighed in with a similar opinion that Clery Act changes have impacted practice. He reflected that these changes had greatly impacted ways that institutional administrators approached training and interdepartmental collaboration. Roger said, "We have more of a coordinated response from a lot of different agencies that maybe usually didn't happen before. It maybe was one or two but

now we've kind of encompassed a large number of groups on campus to respond to certain incidents.” Roger also stressed how changes to the Clery Act had increased training effectiveness. Karen’s interview corroborated this statement. She noted that changes to the policy had bolstered the ways that training is conducted and assessed. She also related that about compliance, these increased training requirements provided opportunities for institutions to allocate funding to beneficial safety programming justifiably.

Lastly, Ben astutely pointed out that when the Clery Act was first signed in 1990, it was solely facilitated by campus police departments. He incredulously pointed out that federal policy should not be the focus of a peace officer who is sworn to protect. He emphatically stated that campus police are trained to act and respond, not untangle policy requirements. Ben’s words illustrate the shift in attitudes about Clery Act responsibilities. Now decades later, most institutions acknowledge that effective Clery compliance is the result of collaboration among many campus stakeholders.

Policy perception. Throughout the data collection process of this study, participants offered insightful perceptions about the Clery Act. Based on the review of literature, their testimonies were coded to assemble secondary analysis on Clery perception. The first-hand testimonies of facilitators who work with the policy lent insight that extended information provided by the literature review.

Allocating resources. Participants provided thoughts on the increased amount of institutional budget and invested human capital necessary to maintain Clery Act compliance. One interviewee stated that Clery requirements drain many institutional resources. Tom expressed that the time required to maintain compliance takes resources away from other missions and other jobs they could be doing. He added that the cost of noncompliance is greater

than investing in compliance and that the cost of noncompliance continues to increase. In juxtaposition, Patricia referred to the fact that smaller campuses are twofold challenged. She explained that on small campuses such as hers, where there are fewer people to attend to compliance responsibilities, administrators are forced to wear many hats throughout the day and that there are only so many hours in a day. Tom summed up the topic of allocated institutional resources:

It's (the Clery Act) very confusing, and it takes up a lot of resources, like I said, I think it could be better directed and could overall improve safety in different ways more effectively on campus if we didn't have to gear so much of our resources and time into compliance, into trying to decipher, dissect, and just handle a very complex law that seems to be growing and becoming more confusing.

Tom's statement brings forward a topic that many Clery Act administrators want to discuss: Clery Act compliance challenges many facilitators and institutional leaders. The cost of implementing the policy is decidedly less than DOE penalties, but many participants vocalized concern about the trade-off between policy effectiveness and institutional investment. Several participants concurred that money allocated toward Clery Act compliance could be more practically spent on other campus mitigation strategies.

Policy effectiveness. Most study participants indicated that they felt that the Clery Act was an effective campus safety policy. A few noted that changes to the policy had led to it becoming slightly complicated to navigate (Johnny, 2018; Tom, 2018). Ben, a participant who repeatedly expressed admiration for the intent of the Clery Act and its usefulness to increase

campus safety, was thoughtful about the worth of its crime statistic reporting, primarily because the metrics can be skewed. Ben explained:

Even from the guidance of the Department of Education itself, because it's so vague, those metrics that we're using aren't very good at giving comparable data between schools. And that was one of the things that the Clerys really wanted the most. They wanted to be able to look at Clery data from one school to the next school and say that this school is more safe or safer than the other school that I'm thinking about and because I am concerned about safety this is going to impact my decision on where I want to go to school or send my kids to school.

Ben's words echo those of other higher education administrators who are involved in Clery Act reporting processes.

Summary

This chapter presented data collected from a multicampus, public institution. The collected data significantly demonstrated that Clery administrators at the site institution employed robust strategies that were intentionally designed to go beyond merely remaining policy compliant; strategies were implemented also to promote campus safety. Participants at the site institution held a wide variety of positions with varying levels of policy responsibility, and they each described policy implementation strategies from their unique perspectives.

Interviewees stressed the importance of collaboration at their institution. Every person interviewed described the manner in which they worked with other administrators at their institution, and sometimes even outside stakeholders, to implement Clery Act compliance strategies. From the data corpus emerged commonly described concepts and themes: Clery reporting requirements, the importance of training and promoting safety, and value of

collaboration. The findings demonstrated that participants were also mindful to assess outcomes, and willing to embrace new strategy techniques that would make policy implementation more effective. Lastly, the data revealed unanticipated findings regarding participants' perception of the Clery Act and ways they have witnessed the policy change over the decades. Chapter 5 will synthesize these results and align the findings with informed practice.

Chapter 5: Discussion and Conclusion

This intrinsic, single institution case study collected data from a public, multicampus university to explore strategies administrators at the study site use to facilitate Clery Act policy compliance and how they describe these implementation strategies. Chapter 4 presented the data and summarized the strategies that these administrators are employing to create a safe campus and remain Clery compliant. Data obtained from interviews, artifacts, and observations provided a detailed glimpse into how the participants perceive their professional roles and how Clery Act policy impacts their institution. Chapter 4 also revealed unanticipated findings that were secondary to the intent of the study but determined worthy of consideration in conjunction with the primary data. These findings emerged during the analysis of participant interviews. Participants expressed similar perceptions and mutual thoughts, and these items were prevalent enough that they were included in the presentation of data. Chapter 5 will summarize the results of the data and discuss how the data impacts policy practice and augments current literature. This concluding chapter will connect the significance of the research to facilitator practice and demonstrate where more research is needed.

Summary of the Results

The intent of this case study was to provide rich, detailed descriptions of the strategies that administrators at one institution employ to facilitate Clery Act policy. From the onset, it was understood that the results may not be generalizable, but that transferability was probable. Therefore, central to the purpose of the intent was the desire to determine findings and present data to offer administrators at similar institutions a glimpse into ways that one institution approached Clery policy compliance. In conjunction with that purpose, the intent was to inform

current literature and serve as a model for more academic research on current Clery Act policy implementation.

Research Questions

Two questions guided the research:

RQ₁: What strategies do Clery Act facilitators at a public university use to implement the policy?

RQ₂: How do facilitators at a public university describe their Clery Act implementation strategies?

Significance and Theory

This study was undergirded by the significance of Clery Act compliance through a lens of policy change theory. As the Clery Act changes and evolves, administrators must adjust their practice responsively. Significance and theory were determined through an extensive review of literature, and seminal literature is included in this section to provide context for the problem and lend insight into the reasons why this study is necessary.

Significance. The significance of this research resides in the fact that the Clery Act requires all postsecondary institutions participating in federal financial aid programs to remain compliant with specific regulations (Department of Education, 2016). However, these regulations are not always explicit about the ways that institutional facilitators achieve mandated outcomes. Integral to this situation is that policy noncompliance can result in the Department of Education assigning damaging fines and penalties to an institution, including the potentiality of complete revocation of an institution's ability to participate in Title IV programs. In 2017, the Department of Education increased the set fine for Clery Act violations to \$54,789 per infraction (Carter, 2017; Winn, 2017). This is nearly double the amount of the original noncompliance

fine, which the Department of Education increased four times since the creation of the policy in 1990 (Carter, 2017). These items highlight the significance of Clery Act research and understanding how the Clery Act administrators facilitate policy compliance. These are best considered by first reviewing ways the policy has changed over time and how it continues to evolve. Institutional change theory was identified as a foundation to guide this scrutiny.

Institutional change theory. Institutional change theory was first developed by Streeck and Thelen (2005) and stated that there are five basic ways that institutional policies change: policies are replaced, amended, and evolve; erode and decay; are redirected toward different goals; or removed abruptly. Gomes and Du Pin Calmon (2015) found that policy continuity and discontinuity impact these types of change. Continuity is expressed by policy equilibrium and abrupt policy change with discontinuity will cause disruption or replacement (Gomes & Du Pin Calmon, 2015). The Clery Act has changed since its initial inception. This is evinced in amendments to the act that were codified in 2000 (*Campus Sex Crimes Prevention Act*, Public L. No. 105–244), 2008 (*Higher Education Opportunity Act*, Public L. No. 110–315), and 2013 (*Violence Against Women Reauthorization Act*, Public L. No.103–322). With each transformation of Clery Act policy, administrators must evaluate new requirements and responsively adjust their practice to remain compliant.

Institutional change theory in relation to the Clery Act was supported by participant testimonials on ways that the policy has changed since 1990 and how these changes required modifications to their policy implementation strategies. For example, many of the participants pointed out that Clery requirements drastically changed when the Clery Act's *Violence Against Women Act* (VAWA) was reauthorized in 2013. Others noted that increased fines and penalties

assessed by the Department of Education for institutional noncompliance demand that Clery Act facilitators become more intentional than ever in complying with Clery Act requirements.

Seminal Literature

The current study originated from an extensive review of Clery Act literature. During this examination, it became evident that there were gaps in the research. Most significant was the lack of available academic research published on strategies that institutional administrators use to implement Clery Act policy (Gardella et al., 2014; Gregory & Janosik, 2012; Wood & Janosik, 2012). This gap in knowledge is problematic because of the importance of the Clery Act and the necessity to understand how institutional administrators perceive their roles and implement Clery Act policy to maintain institutional compliance. Documentation of effective policy implementation strategies can guide other facilitators as they strive to navigate policy process. Thus, it was determined that further research in this area is crucial to discern the strategies that policy facilitators are employing to maintain compliance. Knowledge in this area can guide and improve Clery Act policy implementation, and prompt growth in developing new campus crime prevention techniques. It was not the intent of this study to focus on any specific type of crime, or to address campus crime *per se*. Rather, the purpose of this study was to portray the professional responsibilities of the people at one public institution who implement Clery Act policy.

Seminal scholars. Fisher (1995, 2000, 2002, 2009, 2010, 2013) has studied the Clery Act since the policy's creation in 1990. Fisher was credited as a pioneer Clery Act researcher (Gardella et al., 2014; Wood & Janosik, 2012), and as one who has prolifically published her research. Janosik and Gregory, also forerunners in Clery Act research, conducted extensive research on the policy itself; coauthoring together (Gregory & Janosik, 2002, 2003, 2006, 2009,

2012), publishing solely (Gregory, 2012; Janosik, 2001, 2004), and in many instances with other scholars (Janosik & Gehring, 2003; Janosik & Plummer, 2005; Wood & Janosik, 2012). They presented findings that are critical to understanding how the Clery Act impacted campus safety and institutional compliance. Research conducted by Fisher, Gregory, and Janosik was a foundation for this current study.

Seminal literature was most frequently published between the years 1995 and 2012. However, it is noteworthy that the VAWA reauthorization in 2013 sparked a new wave of research that specifically addressed sexual assault crimes and gender-based violence on campus. It is important to note that this trend in research was directly tied to the VAWA reauthorization, and that VAWA was a result of heightened national awareness of sexual violence (Voth Schrag, 2017).

Recent literature and findings. Based on library resource search engines provided by Concordia University, no peer-reviewed Clery Act specific articles were published in 2018, and only a limited amount were published in 2017. However, it is noteworthy that in 2017 numerous dissertations were published on Clery related research, and in 2018 another four were also published. These examples of contributing literature represent a range of research that includes topics examining stakeholder perception, policy implementation, and ones that explore feminist and gender approaches to the Clery Act policy.

Methodology and Summary of the Findings

Methodology. To increase the trustworthiness of the study, data was triangulated using artifacts, interviews, and observational notes. These three types of data were chosen to establish confidence in the results. The bulk of the data was obtained through the interview process. Artifact and observations were also analyzed to ensure the validity of the data. Participants who

worked in a variety of roles at the site institution described policy implementation strategies and offered insight into ways they use the policy to affect a safer campus. In-person interviewees provided artifacts that were used to triangulate data. Process coding was employed to capture the active nature of their strategy implementation, and every interview was hand coded four times to ensure accurate analysis and data validity.

Participants. Some participants were more actively engaged with Clery Act policy implementation than others. For example, participants who were Title IX coordinators referred to their Clery Act responsibilities as being limited to those of the Clery officers on their campus. They described their duties as a supporting role to the primary function of the Clery officers. Understanding each participant's role in facilitating policy at the institution is essential to fully interpret how these people work together in their Clery Act efforts. There were participants who worked in positions that required daily attention to Clery Act requirements, while others only dealt with monthly or yearly reporting.

Clery officials, campus security authorities, and Title IX coordinators. To provide clarification, individuals with heightened levels of policy responsibility are referred to as Clery officials. Other participants who supported Clery compliance as a part of their position but whose duties are not primarily Clery-related are referred to as campus security authorities (CSA). CSA is a title created by the Department of Education (2016) to identify individuals trained to support campus security and report incidences of crime. The Department of Education recommends that institutions maintain a current list of CSAs. The primary difference between CSAs and Clery officials is that CSAs are trained to recognize and report crime, whereas Clery officials have the authority to act or respond to a reported crime on behalf of the institution (Department of Education, 2016). Other participants included Title IX coordinators,

professionals who are responsible for providing Title IX policy implementation guidance, investigating complaints, and acting as a liaison between the institution and the U.S. Department of Education. Some Title IX coordinators are also trained as CSAs. However, the two titles are not automatically synonymous nor mutually exclusive.

Overlapping functions. There are instances when Clery officials, CSAs, and Title IX coordinators share similar responsibilities and their policy obligations overlap. Karen eloquently stated the relationship between the Clery Act and Title IX, “certainly there are elements of those two laws that are pulling the bus in the same direction, pulling the sled in the same direction.” The overlap between these two laws, Clery Act and Title IX, results in heightened collaboration between departments and administrators who facilitate the separate requirements. It is difficult to completely untangle one law from the other, and collaboration between the two types of facilitators is of utmost necessity. No matter what the participant’s role was, either Clery official or Title IX coordinator, each mentioned how they worked collaboratively to not only ensure compliance with both laws but also to promote campus safety and mitigate crime.

From the data corpus emerged themes and codes that were assigned to three overarching categories: Clery Act policy, facilitator, and overlapping functions. The findings indicated that participants at the site institution worked collaboratively to create and implement effective policy implementation strategies and that they were mindful to assess outcomes so they could continuously improve practice. Participants expressed that they had identified collaborative strategies that had made their policy implementation more effective. Their narratives demonstrated passion for creating safer campuses and their concern for their campus community.

Discussion of the Results

The results of this case study were first analyzed to determine answers to the research questions. The data were further evaluated to understand the importance of common concepts shared by the participants that did not specifically address the study's two research questions. Interpretation of answers to the research questions and the unanticipated findings are discussed in this section.

Discussion of Results: RQ₁

RQ₁ objective. The first research question that guided this study sought to determine specific strategies that Clery Act facilitators at the site institution use to implement Clery policy requirements. The desideratum was to obtain as much detailed information as possible regarding ways that participants supported Clery Act compliance. To that end, the central objective of RQ₁ was to provide concrete examples of current techniques employed at the site institution, and by doing so offer practical ways for similar institutions to model their policy implementation. The participants in this study represented Clery officials, CSAs, and Title IX coordinators; all important positions regarding Clery Act compliance.

The interview comprised seven interview questions; four directly supported the intent of this first research question:

1. How do you work with the policy?
2. How do you, or your department, collaborate with other stakeholders to implement the policy?
3. Have you witnessed a change in the manner that the policy is implemented? If so, what are these? How do they affect your practice?

4. Do you have any additional thoughts you would like to share regarding your Clery Act policy implementation?

These questions were vehicles to gather data on specific ways that the participants implemented Clery Act compliance strategies and worked toward creating a safer campus community.

RQ1 data. The data presented in Chapter 4 presented substantial documentation of reporting and training strategies that facilitators use. In addition to training and reporting, participants detailed ways that they implement campus safety programs and support victims of campus crime. Data collected from the interviews indicated that participants placed immense value on emergency notifications and timely warning strategies. Crime classification was another area that participants were cognizant of, especially to ensure that campus crime metrics were as accurate as possible. Collaboration strategies, both interdepartmental and intercampus, were documented and presented in Chapter 4.

Interview data were triangulated with artifacts and observational notes. The artifacts revealed specific strategies that Clery facilitators use to implement policy requirements at the site institution. Artifacts included informational brochures provided to victims of sexual assault, a form letter used to determine incidences of reportable off-site crime, and individual campus daily crime logs and ASRs. Some of these items, such as the daily crime logs and ASRs, are mandated Clery Act compliance requirements. Other items, such as the informational brochure and standardized letter, are examples of innovative strategies that participants have developed to not only remain compliant but also to improve practice. Observational data detailed a glimpse into the lives of the participants and was useful for understanding their professional roles, but less effective for answering the first research question regarding individual policy implementation strategies.

RQ₁ practical and theoretical implications.

Practical applications. The data obtained for this study addressed the first research question by evidencing strategies employed by Clery facilitators at the site institution. Regarding practical application, participants discussed established techniques and innovative strategies. Strategy innovations reflected marked improvements in ease of policy facilitation and added value to participant efforts by increasing campus security measures and policy compliance. One major innovation is the use of the new, research-based, online training program, Everfi, that was put in place to deliver campus safety training. This platform is used by all the site institution's campuses to provide various levels of training to members of the campus community.

By state law, every new student, at both the undergraduate and graduate level, must complete a module on sexual assault and prevention before arriving on campus. Six months later there is a follow-up assessment to determine if the training impacted behavior. Everfi provides a separate employee module that has a documented 99% completion rate. Before the availability of Everfi's online staff modules, this training was conducted in person via sessions collaboratively delivered by the site institutions' Human Resource office, the Title IX coordinator, and the Women's Resource coordinator, and the campus Clery officer. Many participants commented on the effectiveness of this training system designed by Everfi. Karen explained:

Everfi was really attractive to us in that they employ a research-based approach in designing their training. They pay close attention to the literature and the most effective methods for training and what content needs to be part of the training. So, we require all new students, graduate, freshman, transfer, to complete a

module on sexual assault prevention and awareness before they step foot on campus.

Some participants noted that another innovative strategy was the institution's centralization of Clery Act compliance. This major change occurred in 2015 with the hiring of Ben, a Clery official who provides policy oversight to all the system campuses. Ben's position is housed with the institution's legal defense office, and, as he noted, that is a break from the national norm. Historically, Clery Act compliance ran through the campus police department or security office. Ben explained further:

Clery really was seen as something that was solely the responsibility of the police department or security department on a college or university campus. And I would say certainly say that within the last five years . . . it may be a little bit longer than that, maybe five to ten years, we're starting to see institutions are taking a much more collaborative and holistic approach to the Clery Act, and really in recognition of the way it was always intended to be—as being kind of a campus overarching a federal mandate as opposed to something that's just focused within the police department so yes it's definitely a trend we are seeing, where Clery compliance definitely has its place within a university or college police or security department but as we see professionals working Clery outside of the police department and kind of show how the implementation of this policy has changed over time, and how it really has become to be accepted as just another federal legislative piece that guides and regulates higher education in the United States.

Participants expressed that centralization was a great asset for many reasons. Ben's position provides guidance when individual campus officials have questions, and Tom noted that Ben offers oversight and compliance assistance. Tom also referred to the fact that he and Ben annually review the off-site property list, those properties that the university owned and controlled away from the core campus where there may not be staff to report Clery information.

These examples demonstrate that innovative practices in Clery Act implementation make a difference in approach to compliance and campus safety. These also reveal that institutional investment is necessary to achieve Clery Act compliance goals. Software programs such as Everfi are expensive, and the retention of a centralized Clery officer housed in an institution's legal defense unit is also a budgetary commitment. Undertakings like these illustrate the importance of institutional leaderships' engagement in Clery Act compliance.

Theoretical implications. Institutional investment, both monetary and human capital, in established and new policy implementation strategies demonstrate that leaders at the site institution are committed to maintaining Clery compliance and increasing campus safety. Such investment also reflects that institutional leaders acknowledge the importance of the Clery Act and its staying power. As Ben noted, recognition of the Clery Act as a guiding legislative piece in higher education is becoming a national trend. Renewed interest in the Clery Act, in conjunction with recent amendments such as VAWA, illustrate that the law is evolving in ways that can be defined through the lens of institutional change theory. This was an unexpected revelation. Based on the literature review, prior research indicated that attitudes and perceptions regarding the Clery Act reflected policy decay and eventual removal. Study participants unanimously expressed appreciation for ways that the Clery Act has improved campus safety.

RQ₁ limitations. One limitation involved the ability to collect observational data. The interviews were designed to be conducted in person or via WebEx, an online meeting platform that allows video recording. However, most of the interviews were conducted via phone, and the few WebEx participants opted out of video. Only four of the nine interviews were conducted in person, which created a gap in observational data. This also translated into a gap in artifacts as it was noted that in-person interviewees offered artifacts that supplanted the online items retrieved from each campus' website. These online artifacts included each campus's ASR and a weekly review of their daily crime logs. Participants who were interviewed by phone did not offer artifacts for use in the study. Future studies would be well-advised to more intentionally collect artifact and observational data relative to strategy implementation.

Discussion of Results: RQ₂

RQ₂ objective. This study's second research question was designed to detail ways that participants described their Clery Act implementation strategies. The objective was to provide a rich narrative of participants' professional roles and Clery efforts. An additional objective of this question was to document the variety of positions that work with Clery Act policy at the site institution. The participants in this study represented Clery officials, CSAs, and Title IX coordinators; all important positions regarding Clery Act compliance. Of the seven interview questions, two directly supported the intent of the second research question:

1. How do you directly work with Clery Act policy?
2. How do you, or your department, collaborate with other stakeholders to implement the policy?

By sharing their unique perspectives, participants provided a foundation for administrators at other institutions to identify points of intersection.

RQ₂ data. Chapter 4 presented data that detailed the variety of ways participants supported Clery Act compliance and how they perceived their contribution to compliance and campus safety. From this data sprang a comprehensive picture of collaborative efforts shaped by individual passion for campus safety. Participant descriptions of implementation strategy were undergirded by their role and responsibilities at the site institution. They expressed excitement when describing their participation in current campus safety projects or when relating successful policy implementation strategies. Nicole proudly related one way she supports victims, while at the same time prompting the reporting process:

I have helped students who have talked to me, then (they start) feeling confident and prepared to contact the police, and so I've helped them do that. I've had police come to this office and interview students to get that process started.

Nicole's enthusiasm for supporting students and campus safety was infectious, and every participant, in one way or another, shared a similar sense of accomplishment regarding their role to further institutional compliance and campus safety. Across the board, study members elucidated their pride in institutional campus safety efforts, and all agreed that they worked on a safe campus. Participants often praised their coworkers; another indication of the cohesiveness of this group. Every interviewee defined their role in ways that it complemented group efforts toward Clery Act compliance and campus safety.

The unique descriptions of personal responsibility for Clery Act policy implementation provided detailed insight into the daily strategies that policy administrators use. Increased efforts to support victims of crime and sexual assault, improvements in training for all campus stakeholders, and optimized reporting metrics were just some areas that generated a great deal of enthusiasm for the study participants.

The data collected for the second research question demonstrated that participants placed value on their efforts and were passionate about improving campus life.

RQ₂ practical and theoretical implications.

Practical applications. As noted in the discussion of RQ₁, there were many levels of monetary and human capital commitments to Clery compliance at the site institution. However, equally important as institutional leadership's commitment and investment in Clery compliance was the passion of the study participants to fulfill their duties and promote campus safety. There are no training manuals that can lead a person to professional passion. It could be inferred that individuals, such as those who participated in this study, should be hand chosen based on qualifications that are balanced by experience and personality. Noteworthy is the emphasis that participants placed on the safety of their campus community. This is not to state that they shirked their Clery Act compliance duties, but more so to highlight that campus safety was of extreme importance.

Theoretical implications. RQ₂ revealed participants' focus on safety. Considering recent amendments to the Clery Act, this finding further demonstrated ways that the policy has evolved from a consumer protection law to one that more intentionally mitigates campus violence and promotes campus security. The Clery Act has developed into a body of legislative mandates that more cohesively addresses aspects of campus community well-being.

RQ₂ limitations. As were the limitations associated with RQ₁, limitations associated with RQ₂ also included a lack of observational data. Four of the nine interviews were conducted in person, and that observational data was extremely useful to further an understanding of the participants' roles and responsibilities. Collected observational data created a context for understanding the place where the interviewee was daily situated and revealed how they

expressed themselves professionally. The interviews that lacked this type of data collection were meaningful and provided a rich narrative, but they did not allow a perfect glimpse into the interviewee's daily duties.

Discussion of the Results in Relation to the Literature

Problem and significance. The literature review manifested a lack of single institution, Clery Act policy implementation studies. This gap in knowledge is easily rectified through research that intentionally examines ways that Clery Act facilitators approach policy compliance. This study was created to bridge the literature gap and inspire other researchers to do the same.

Problem. Lack of rigorous research on ways that Clery Act facilitators implement strategy was identified as a challenge for institutional leaders and facilitators who endeavor to construct their approach to Clery Act compliance efforts. The importance of determining effective policy implementation strategies is embedded in potential noncompliance fines determined by the Department of Education, and the possibility of losing access to federally funded Title IV programming (Carter, 2017; Winn, 2017). The findings of this study served to provide richly detailed examples of ways that facilitators continue to implement Clery policy at one multicampus institution. These findings inform practice, augment currently available academic literature, and act as impetus for scholars to further Clery Act research.

Significance. The significance of the findings is best understood through the lens of the literature review. This study began with an extensive review of Clery literature. Although both peer-reviewed and nonpeer-reviewed literature were scrutinized, greater weight was placed on academic research that was peer reviewed. Seminal authors sought to document awareness and perception of the Clery Act, and its impact as an effective consumer protection law and ability to increase campus safety. Researchers such as Fisher (1995, 2000, 2002, 2009, 2010, 2013) and

Janosik and Gregory (Gregory, 2004; Gregory & Janosik, 2002, 2003, 2006, 2009, 2012; Janosik, 2001, 2004; Janosik & Gehring, 2003; Janosik & Plummer, 2005; Wood & Janosik, 2012) presented findings critical to understanding the Clery Act. Based on this evaluation, it was established that further research in the area of current policy implementation was necessary. This gap in Clery knowledge was a springboard to design a study that would inform policy practice and launch more research in the field of Clery compliance and campus safety.

Limitations. Anticipated findings of this study included documenting concrete implementation strategies and offering rich narratives of participant perspective. These findings were evidenced in Chapter 4 with the presentation of data. Highlighted among this group of outcomes was the testimony of the participants regarding strategy innovations in Clery compliance and campus safety. To reiterate, lack of observational data was challenging. One option that would counteract this limitation would be to design a study that invites only participants who can be interviewed in person. Recommendations to strengthen similar studies of this nature include suggesting that future researchers be well-advised to design a study that includes data collection components conducive to shadowing the participants during their professional hours while they directly work with Clery implementation strategies. This information would deepen the understanding of specific techniques and provide opportunities to gather heightened data on participant perspective.

Seminal literature was primarily conducted on a broad level (Gregory & Janosik, 2012). Studies were designed to include large sample populations, and findings from these studies were important to capture the perceptions of Clery Act stakeholders (Chekwa et al., 2013; Janosik, 2001, 2004; Gregory & Janosik, 2002, 2003, 2006, 2009; Janosik & Gehring, 2003; Janosik & Plummer, 2005). The results were used to present a broad determination of policy effectiveness.

However, it was not the intent of this study to focus on one type of crime, policy stakeholder, or to gauge national perception.

Rather, the purpose of this study was to examine and document practical implementation strategies and the professional responsibilities of people who facilitate Clery Act policy. This study began as a scrutiny of Clery Act facilitators who worked on one small campus of a large multicampus, public university. Initially, the reduced sample size of the population was a limitation. From the onset, it was challenging to recruit participants. There may have been barriers to people's willingness to participate. However, these are unconfirmed. The supposed barriers include an investment of time and concern to discuss a topic that carries hefty institutional financial implications and penalties.

To reiterate, the initial study was intended to be conducted on one small campus of a large, multicampus university. The site was identified as optimal due to proximity for the researcher. However, because of the lack of response to the researcher's emailed invitations to participate, the study site was expanded to include all the university's campuses. The limitation became an opportunity to broaden the participant base to include policy facilitators from all of the institution's campuses and examine the way that the system campuses cohesively work towards the same Clery Act compliance goals.

Implications of the Results for Practice, Policy, and Theory

Practice. Based on the literature review, anticipated findings were predicted. Most notably, it was conjectured that this study would reveal that Clery Act administrators at the site institution would express that policy requirements are complicated to navigate and that the mandates are a burdensome drain on institutional resources. While some of these adumbrations were partially correct, the study divulged a greater depth to ways that the Clery Act has

transformed practice at the site institution. Participants expressed that they felt their efforts towards Clery Act compliance augmented overarching efforts towards campus safety.

From the onset of the study, it was understood that there is a tenuous line between Clery Act compliance and campus safety. The Clery Act was first created as a consumer protection law and has evolved into a tightly knit mesh of campus security policies that guide facilitators not only toward compliance but also toward campus safety. Loosely worded Clery Act requirements provided by the DOE were approached as an issue and a challenge for facilitators to navigate. However, it became clear that many of these open-ended mandates allow for innovation on the part of policy facilitators. Such innovations are transforming ways that campus safety is optimized.

Policy. Additionally, based on the literature review, it was assumed that data would reveal an overall participant perception of Clery Act ineffectiveness. However, this was not the case. Although some participants noted they thought that that law could be improved, every person interviewed expressed appreciation for ways that the Clery Act has advanced campus safety. Ben explained that the Clery Act exerts “good pressure.” He said:

By good pressure, I mean students are people attending institutions, and they have an expectation that colleges and universities are doing their part. And if they see deficiencies, you know, I think it's good that they questioned it and they want to look into it and dive deeper. I think that external pressure is sometimes really helpful and having more well-rounded and balanced approach because sometimes you can kind of get lost in the black and white of a policy without saying out the impact that has on those that are affected by it.

Ben's words were stark contrast to those determined by the literature review. However, they echoed the sentiment of all his colleagues.

Theory. Institutional change theory undergirded this study to explore how policies change to meet the needs of the stakeholders, and how these changes relate to policy transformation such as adaptation, exhaustion, and atrophy (Cerna, 2013; Streeck & Thelen, 2005). The basis of the theory resides in Streeck & Thelen's (2005) proposed concept that policies will undergo specific types of changes that are dependent on the actors (e.g., facilitators, stakeholders, and leaders) who implement process and enforce mandates. The unexpected findings of this study included evidence that the policy is not as ineffectual as the literature review illustrated. Relative to that assumption and in conjunction with institutional change theory is the fact that the Clery Act is neither decaying nor nearing abrupt dismissal. Based on information provided by the participants, the Clery Act is still considered a useful policy to ensure campus safety and mitigate crime. The analyzed data demonstrated that participants' perceptions of the Clery Act are positive. Findings indicated that the line between compliance and campus community safety are sometimes blurred for facilitators. This demonstrates to our community of scholars that more research is necessary for this field.

Recommendations for Further Research

Recommendation #1: Advocate for improved ways to align Clery Act policy with campus safety initiatives. The Clery Act was created as a consumer protection law for students and their families as they examined postsecondary choices (Gregory & Janosik, 2012). As demonstrated by this study's participants, the Clery Act has evolved as a campus safety law, and as Ben indicated, this has exerted "good pressure." This pressure has effected positive changes at the site institution. The power of the Clery Act does not reside in its consumer protection

policies; evidence indicates that it is guiding campus safety facilitation. However, there may still be a rift in the ways that the policy is perceived by those who facilitate its regulations. Data for this study indicated that while some participants adhere strictly to compliance components of the law, others are more deeply invested in supporting victims of campus violence and promoting safer campus community standards. This study revealed that there are noticeably blurred lines between Clery compliance and campus safety efforts. It should be acknowledged that institutional leaders and policy facilitators respect the importance of both issues; however, alignment of policy guidelines with the intent of campus safety is of great import to increase the security of higher education communities. There is a need to further this conversation and examine ways that the Clery Act can regulate both.

Recommendation #2: Further research regarding hate crimes. During the data collection phase, it was noted that few participants discussed the Clery Act's hate crime reporting requirements. Hate crimes are defined as criminal offenses where there is evidence that the crime was committed because of the perpetrator's bias against the victim (Department of Education, 2016). The Clery Act mandates reporting in the following areas of bias: race, religion, sexual orientation, gender, gender identity, ethnicity, national origin, and disability.

Hate crime reporting in higher education was first introduced with the *Hate Crimes Prevention Act of 1997* (H. R. 3081). This law was aligned with the Clery Act under the *Higher Education Opportunity Act of 2008* amendment (HEOA, P.L. 110–315). The 2013 VAWA recodification strengthened hate crime reporting with the addition of two new reportable bias types: national origin and gender identity (McCallion, 2014).

A call for further research in this area is not indicative that the site institution is not compliant with this reporting requirement. It is understood that this issue may not be a challenge

at the site institution, and it is also understood that nationally more attention and resources are allocated towards VAWA's sexual violence requirements. However, considering current national conversations on race and identity, this topic should be investigated fully to ensure that the Clery Act equitably protects all members of an institution's community and to improve the effectiveness of the Clery Act.

Recommendation #3: Further research in the area of increased victim reporting.

One unanticipated finding of this study was increased victim reporting at the site institution. Two participants mentioned that there had been a rise in reports of sexual violence. However, both participants also pointed out that this does not reflect an increase in incidences of sexual violence, but instead it was indicative of the fact that victims felt safe to come forward. Karen explained, "Reports are up, and I count that to be a good thing, because it's the most underreported issue . . . I don't believe there are more incidents, but I do believe we've sort of taken the shroud off." Judy corroborated this fact, "More incidents (are being) reported, not that we have more incidents, but more are reported." Research on this topic would lend insight to determining what strategies are most effective to effect improvements in victim self-reporting, and ways that victim advocates can promote further increases in this area.

Conclusion

On April 5th of 1986, Jeanne Clery was tortured, raped, and strangled to death in her dorm room at Lehigh University in Bethlehem, Pennsylvania (Associated Press, 1986; Doss et al., 2017; Peterson, 2011). The Clery Act is a testament to her death. One participant in this study, a Title IX coordinator who began in higher education as a resident assistant in the dorms, lent an eerily resonating, personal voice to this research:

I was an RA. I remember being trained on Jeanne Clery and her story of being assaulted, and unpropping doors constantly as an RA every time. . . . You did rounds multiple times a night, and you're always unpropping the doors, so I don't know. It's like it's been part of my consciousness for a long time, and I think it's important.

This study examined data obtained from interviews, artifacts, and observation to provide detailed documentation of strategies that each of the participants at the site institution use to support Clery compliance and campus safety. The data also provided insight into the participants' perspectives of their roles as policy facilitators and ways that they promote campus safety. Many participants expressed the importance of newly centralized Clery Act coordination efforts. This emerged as one of the most effective and important strategy innovations.

In addition to data collected to answer the research questions, unanticipated findings were also revealed. These findings emerged through an analysis of common sentiments expressed by the participants during their interviews. Participants vocalized similar perceptions and mutual thoughts that were determined to be relevant to the study of Clery Act policy implementation. Although these unanticipated findings were secondary to the intent of the study, the prevalence of these data points is worth consideration.

This study was a process of inquiry in the hope of providing answers to the research questions, but it also identified new areas of investigation. Participants shared their unique perspective, and together their stories formed a visual image of what Clery Act policy implementation is like at their institution. Innovative strategies to approach Clery compliance are available if facilitators are willing to search. More striking than any strategy are the people who passionately seek to create safer campuses and support victims of campus crime. This study

documented the collaborative efforts of one group of facilitators at a multicampus, public institution. Through the lens of their narratives, it is expected that continued conversation will powerfully emerge and result in greater strides to make campus communities safe.

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Appendix A: Interview Questions

Please explain the way(s) that the Clery Act is of importance to your department.

How do you directly work with the Clery Act policy?

How do you, or your department, collaborate with other stakeholders to implement the policy?

How do you feel the Clery Act impacts your campus?

Do you see any weaknesses in current Clery Act policy implementation strategies?

Have you witnessed a change in the manner that the policy is implemented? If so, what are these? How do they affect your practice?

How do you think you can improve current strategies to develop institutional policy effectiveness?

Do you have any additional thoughts you would like to share regarding your Clery Act policy implementation?

Do you have any questions for me?

Appendix B: Consent Form

Research Study Title: A Case Study: Clery Act Policy and Implementation Strategies

Principal Investigator: Sara G. Beverage

Research Institution: Concordia University–Portland

Faculty Advisor: Dr. Brianna Parsons

Purpose and what you will be doing:

The purpose of this survey is to examine how one institution implements the Clery Act policy, and to richly detail the experiences of those who facilitate its regulations. We expect approximately 8–12 volunteers. No one will be paid to be in the study. Participants will be selected on a first come, first serve basis; and no more than 12 will be included for participation. To be in the study, you will take part in a 30–minute, semi–structured interview that will be digitally recorded. Upon completion of the interviews you will be asked to review a transcript of the conversation and either approve of its use, approve with changes, or withdraw from participation in the study. Doing these things should take less than one hour of your time.

Risks:

There are no risks to participating in this study. The institution will be deidentified, and you will be assigned a pseudonym to protect your identity. Every effort will be made to protect your information and maintain your anonymity. Any personal information you provide will be coded so it cannot be linked to you. Any name or identifying information you give will be kept securely via electronic encryption. When we, or any of our investigators, look at the data, none of the data will have your name or identifying information. We will not identify you in any publication or report. Your information will be kept private always, and all study documents

will be destroyed 3 years after we conclude this study. All recordings will be destroyed immediately after the study is complete.

Benefits:

Information you provide will help by contributing to a body of knowledge that is vital to your profession, while at the same time providing depth and understanding to Clery Act policy implementation for other universities to use to model their own practice.

Confidentiality:

This information will not be distributed to any other agency and will be kept private and confidential. The only exception to this is if you tell us about abuse or neglect that makes us seriously concerned for your immediate health and safety.

Right to Withdraw:

Your participation is greatly appreciated, but we acknowledge that the questions we are asking are personal in nature. You are free at any point to choose not to engage with, or also stop the study. You may skip any questions you do not wish to answer. This study is not required and there is no penalty for not participating. If at any time you experience a negative emotion from answering the questions, we will stop asking you questions.

Contact Information:

You will receive a copy of this consent form. If you have questions you can talk to or write the principal investigator, Sara Beverage at “Redacted.” If you want to talk with a participant advocate other than the investigator, you can write or call the director of our institutional review board, Dr. OraLee Branch (email obrand@cu-portland.edu or call 503-493-6390).

Consent Form (Continued)

Your Statement of Consent:

I have read the above information. I asked questions if I had them, and my questions were answered. I volunteer my consent for this study.

Participant Name

Date

Participant Signature

Date

Investigator Name

Date

Investigator Signature

Date



Investigator: Sara G. Beverage email: [redacted]

c/o: Professor Dr. Brianna Parsons email: brparsons@cu-portland.edu

Concordia University-Portland

2811 NE Holman Street

Portland, Oregon 97221

Appendix C: Transcript Review Communication

Subject line– Clery Act: Transcript Review

Dear X,

Thank you again for participating in my study and contributing your valuable knowledge to support Clery Act research.

Attached you will find a transcript of your interview. You have been assigned the pseudonym “X” to protect your identity. Any personal information you provided has been coded so it cannot be linked to you or others whom you may have mentioned. The institution was also deidentified to protect information and maintain anonymity.

Please review the conversation and either approve of its use or approve with changes. If there are changes you would like to make please notify me so that I might make the appropriate adjustments. At this time, and at any time, you also have the option to withdraw from participation in the study.

With sincerest thanks and highest regards,

Sara

Appendix D: *A Priori* Codes

Implementing policy

Perceiving policy

Training

Reporting

Collaborating with (departments/stakeholders)

Assessing outcomes

Complying

Appendix E: Final Categories, Themes, and Codes (Process coding)

Category: Clery Act Policy

Theme: Compliance strategies

Coding crime

Collaborating

Protecting consumers

Promoting safety

Reporting

Training

Timely warning

Threat assessment

Promoting campus safety

Raising stakeholder awareness

Theme: Policy Development

Contextualizing

Developing social attitudes (policy evolution)

Promoting safety (progression of)

Theme: Resources

Budget

Human capital

Category: Overlapping functions (Clery Act & Title IX)

Theme: Compliance strategies

Training

Reporting

Collaborating

Supporting victims

Promoting campus safety

Theme: Facilitator perception

Assessing practice/assessing outcomes

Changing strategies (responsively)

Supporting victims

Promoting campus safety

Category: Facilitator

Theme: Describing duties/role

Assessing practice/assessing outcomes

Changing strategies (responsively)

Collaborating with others (departments/stakeholders)

Raising awareness

Training

Theme: Perceiving policy (facilitator)

Contextualizing

Describing policy

Draining resources

Developing social attitudes (policy evolution)

Perceiving value (duties, policy, & outcomes)

Questioning policy

Appendix F: Statement of Original Work

The Concordia University Doctorate of Education Program is a collaborative community of scholar-practitioners, who seek to transform society by pursuing ethically-informed, rigorously-researched, inquiry-based projects that benefit professional, institutional, and local educational contexts. Each member of the community affirms throughout their program of study, adherence to the principles and standards outlined in the Concordia University Academic Integrity Policy. This policy states the following:

Statement of academic integrity.

As a member of the Concordia University community, I will neither engage in fraudulent or unauthorized behaviors in the presentation and completion of my work, nor will I provide unauthorized assistance to others.

Explanations:

What does “fraudulent” mean?

“Fraudulent” work is any material submitted for evaluation that is falsely or improperly presented as one’s own. This includes, but is not limited to texts, graphics, and other multi-media files appropriated from any source, including another individual, that are intentionally presented as all or part of a candidate’s final work without full and complete documentation.

What is “unauthorized” assistance?

“Unauthorized assistance” refers to any support candidates solicit in the completion of their work, that has not been either explicitly specified as appropriate by the instructor, or any assistance that is understood in the class context as inappropriate. This can include, but is not limited to:

- Use of unauthorized notes or another’s work during an online test
- Use of unauthorized notes or personal assistance in an online exam setting
- Inappropriate collaboration in preparation and/or completion of a project
- Unauthorized solicitation of professional resources for the completion of the work.

Statement of Original Work (Continued)

I attest that:

1. I have read, understood, and complied with all aspects of the Concordia University–Portland Academic Integrity Policy during the development and writing of this dissertation.
2. Where information and/or materials from outside sources has been used in the production of this dissertation, all information and/or materials from outside sources has been properly referenced and all permissions required for use of the information and/or materials have been obtained, in accordance with research standards outlined in the *Publication Manual of The American Psychological Association*

Digital Signature Sara G. Beverage_____

Name (Typed) Sara G. Beverage_____ Date 2/11/2019