

Project Plan: Compiling the Annual Security Report

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HOW TO USE THIS DOCUMENT

This resource was created by the Clery Center to help colleges and universities draft concrete action steps for compiling their annual security reports. The document may not reflect every step a particular institution should take as it is intended to provide an overarching structure through which colleges and universities can determine what actions are needed for their specific campuses. We provide context for why we include certain information or how it can be tailored to a particular institution. With that in mind, keep an eye out for the blue boxes throughout the document that will suggest things to consider in relation to your own college or university.

If you have any questions as you review this document or move forward with compiling your own annual security report, please connect with us:

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While this document contains a discussion of general legal principles and specific laws, it is neither intended to be given as legal advice nor as the practice of law, and should not be relied upon as such. Before taking any action, always check with a licensed attorney in your jurisdiction to ensure compliance with the law.

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INTRODUCTION

PURPOSE OF PLAN

The “Compiling the Annual Security Report Project Plan” will provide a definition of the project, including the project’s goals and objectives.

The Project Plan defines the following:

- Project Purpose
- Project Goals and Objectives
- Scope and Expectations
- Roles and Responsibilities
- Project Management Approach
- Project Timeline

BACKGROUND INFORMATION

The Clery Act and the United States Department of Education’s regulations require Title IV participating institutions to publish an annual security report containing safety and security related policy statements and crime statistics and distribute it to all current students and employees. Institutions must also inform prospective students and employees about the availability of the report.

The report must contain the following information:

CRIME STATISTICS

- Crime statistics for the three most recent calendar years for each of the following crimes that occurred on or within Clery geography that were reported to a local police agency or campus security authority
 - » Criminal homicide: murder and non-negligent manslaughter, manslaughter by negligence
 - » Sex offenses: rape, fondling, incest, statutory rape
 - » Robbery
 - » Aggravated assault
 - » Burglary
 - » Motor vehicle theft
 - » Arson
 - » Arrests and referrals for disciplinary action for liquor law violations, drug law violations, and illegal weapons possession
 - » Hate crimes for all of the above crimes that are determined to be hate crimes and larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property
 - » Dating violence, domestic violence, and stalking

REPORTING CRIMES & OTHER EMERGENCIES

- A statement of policies regarding procedures for students and others to report criminal actions or other

emergencies occurring on campus. This statement must include the institution's policies concerning its response to these reports, including:

- » Policies for making timely warning reports to the campus community
- » Policies for preparing the annual disclosure of crime statistics
- » A list of the titles of each person or organization to whom students and employees should report criminal offenses for the purposes of making timely warning reports and the annual statistical disclosure
- » Policies or procedures for victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics

SECURITY AND ACCESS

- A statement of policies concerning security of and access to campus facilities, including campus residences, and security considerations used in the maintenance of campus facilities

CAMPUS LAW ENFORCEMENT

- A statement of policies concerning campus law enforcement that
 - » Addresses the enforcement authority and jurisdiction of security personnel
 - » Addresses the working relationship of campus security personnel with state and local police agencies, including
 - Whether those security personnel have the authority to make arrests; and
 - Any agreements, such as written memoranda of understanding between the institution and such agencies, for the investigation of alleged criminal offenses

ACCURATE & PROMPT REPORTING

- Encourages accurate and prompt reporting of all crimes to the campus police and the appropriate police agencies, when the victim of a crime elects to, or is unable to, make such a report

VOLUNTARY CONFIDENTIAL REPORTING PROCEDURES (PASTORAL & PROFESSIONAL COUNSELORS)

- Describes procedures, if any that, encourage pastoral counselors and professional counselors, if and when they deem it appropriate, to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics

PROGRAMS

- A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others

MONITORING AND RECORDING

- A description of programs designed to inform students and employees about the prevention of crimes

NONCAMPUS LOCATIONS OF STUDENT ORGANIZATIONS

- A statement of policy concerning the monitoring and recording through local police agencies of criminal activity by students at noncampus locations of student organizations officially recognized by the institution, including student organizations with noncampus housing facilities

DRUGS AND ALCOHOL

- A statement of policy regarding the possession, use, and sale of alcoholic beverages and enforcement of state underage drinking laws
- A statement of policy regarding the possession, use, and sale of illegal drugs and enforcement of federal and state drug laws
- A description of any drug or alcohol-abuse education programs, as required under the Drug-Free Schools and Communities Act of 1989 (can cross-reference)

SEXUAL ASSAULT, DOMESTIC VIOLENCE, DATING VIOLENCE, & STALKING

- A statement of policy regarding the institution's programs to prevent dating violence, domestic violence, sexual assault, and stalking and of procedures that the institution will follow when one of these crimes is reported. The statement must include:

SEXUAL ASSAULT DOMESTIC VIOLENCE, DATING VIOLENCE, & STALKING:

PROGRAMS & CAMPAIGNS (SEE REGULATIONS FOR SPECIFICS)

- » A description of the institution's educational programs and campaigns to promote the awareness of dating violence, domestic violence, sexual assault, and stalking

SEXUAL ASSAULT DOMESTIC VIOLENCE, DATING VIOLENCE, & STALKING:

PROCEDURES TO FOLLOW

- » Procedures victims should follow if a crime of dating violence, domestic violence, sexual assault, or stalking has occurred, including written information about:
 - The importance of preserving evidence that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order;
 - How and to whom the alleged offense should be reported;
 - Options about the involvement of law enforcement and campus authorities, including notification of the victim's option to
 - » Notify proper law enforcement authorities, including on-campus and local police;
 - » Be assisted by campus authorities in notifying law enforcement authorities if the victim so chooses; and
 - » Decline to notify such authorities; and
 - » Where applicable, the rights of victims and the institution's responsibilities for orders of protection, "no-contact" orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court or by the institution;
 - Information about how the institution will protect the confidentiality of victims and other necessary parties, including how the institution will
 - » Complete publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifying information about the victim, as defined in section 40002(a)(20) of the Violence Against Women Act of 1994 (42 U.S.C. 13925(a)(20)); and
 - » Maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures;

SEXUAL ASSAULT DOMESTIC VIOLENCE, DATING VIOLENCE, & STALKING:

WRITTEN NOTIFICATION

- A statement that the institution will provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the institution and in the community;
- A statement that the institution will provide written notification to victims about options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures. The institution must make such accommodations or provide such protective measures if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement

SEXUAL ASSAULT, DOMESTIC VIOLENCE, DATING VIOLENCE, & STALKING:

PROCEDURES FOR DISCIPLINARY ACTION (SEE REGULATIONS FOR SPECIFICS)

- An explanation of the procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking

SEXUAL ASSAULT, DOMESTIC VIOLENCE, DATING VIOLENCE, & STALKING:

WRITTEN EXPLANATIONS OF RIGHTS & OPTIONS

- A statement that, when a student or employee reports to the institution that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the institution will provide the student or employee a written explanation of the student's or employee's rights and options

SEX OFFENDER REGISTRATION:

- A statement advising the campus community where law enforcement agency information provided by a State under section 121 of the Adam Walsh Child Protection and Safety Act of 2006 (42 U.S.C. 16921), concerning registered sex offenders may be obtained, such as the law enforcement office of the institution, a local law enforcement agency with jurisdiction for the campus, or a computer network address.

EMERGENCY RESPONSE & EVACUATION:

(SEE REGULATIONS FOR SPECIFICS)

- A statement of policy regarding emergency response and evacuation procedures

MISSING STUDENT NOTIFICATION:

(SEE REGULATIONS FOR SPECIFICS)

- A statement of policy regarding missing student notification procedures

GOALS & OBJECTIVES

THINGS TO CONSIDER: INSTITUTIONAL GOALS & OBJECTIVES

Reflecting on the institution's mission or vision statement provides a helpful foundation for highlighting which institutional goals and objectives relate specifically to this project. Use this section to communicate how the values and goals of the institution align with the goals of the project. Throughout the project, use your institution's mission and/or vision statement as a lens through which to read the existing annual security report and determine if it reflects the values and goals of the institution itself. For example, part of [XYZ Institution]'s mission is to be an inclusive and diverse community. The development of the annual security report helps meet this goal by sharing the options and resources we provide to all students and employees regardless of race, gender, gender identity, sexual orientation, religion, or disability.

PROJECT GOALS & OBJECTIVES

Project goals and objectives include:

- Convene multidisciplinary team for compilation and dissemination of institution's annual security report in compliance with the Clery Act
- Accomplish project goals and objectives within time parameters

PROJECT APPROACH

Phase 1: Formulation of Clery Team

Phase 2: Assessment of Previous Year's Annual Security Report

Phase 3: Compilation of Crime Statistics for Annual Security Report

Phase 4: Development of Report

Phase 5: Review of Report

Phase 6: External Review of Report

Phase 7: Final Edits & Design

Phase 8: Dissemination of Report

Phase I: Formulation of Clery Team

- Establish multi-disciplinary team to review the institution's policies and procedures to ensure compliance with the Clery Act.
- The team shall include the Clery Coordinator and at least one senior level representative from the following departments:
 - » Campus Police/Public Safety
 - » Office of Student Conduct
 - » Office of Residence Life
 - » Office of General Counsel
 - » Office of Diversity and Inclusion
 - » Wellness Center
 - » Office of Emergency Management
 - » Title IX Office
 - » Office of Victim Assistance
 - » Human Resources
- Individuals from the following departments will contribute on an as-needed basis:
 - » Office of Greek Life
 - » Athletics Department
 - » Office of Facilities
- The entire team will convene at the start of the project to review the goals and objectives, project timelines, and establish working groups if necessary. The team will also be notified of any changes to the Clery Act or relevant guidance that will inform the process.

THINGS TO CONSIDER: FORMULATION OF CLERY TEAM

If a Clery Team is already in place the project plan can be used to structure specific action areas related to compiling the annual security report.

Depending on the size and structure of your institution, you may or may not have all of these individuals or offices at the table. You may also have individuals who wear "multiple hats" on campus. If this is the case, look

more at the functional areas of the departments listed and the specific tasks outlined later in this document. Who would play a role in coordinating these elements? Are they involved in developing the annual security report? Clery compliance requires cross-discipline collaboration because the requirements involve numerous areas that go beyond the scope of an individual role.

If it is difficult to bring these individuals together, consider whether it is possible to gain additional buy-in from campus leadership. Use this document, Department of Education program review data, and other leadership documents to reinforce why a multidisciplinary team is needed for this project. Consider whether there is at least one individual with a direct line or report to the President represented on the team.

One person should be assigned as the lead for this project. The project lead will schedule meetings, work with the team to establish deadlines, and be the point person for organizing information, answering questions, and keeping the project on track.

Phase 2: Assessment of Previous Year's Annual Security Report

- Identify individuals from multi-disciplinary team who will assess compliance with the previous year's annual security report.
- Organize needed materials, including the annual security report (ASR), existing campus policies, and any resources used for assessment (Clery Act regulations, the Handbook for Campus Safety and Security Reporting, Clery Act training materials, checklists, etc.)
- Use the regulations and other materials to review each required element of the annual security report (all policy statements and statistics). Compare the language within the annual security report to Clery Act requirements and cross-reference existing campus policies.
- Answer the following questions for each section:
 - » Does the policy statement reflect all the required elements listed within Clery Act regulations? If not, what information is missing? Be specific.
 - » Does the policy statement reflect campus policy?
 - » If information is missing within the policy statement, does it appear to be a gap in information provided within the annual security report or would there need to be a change of policy? Note if unsure.
 - » What individuals or departments would be involved in making necessary updates for this section?
- Compile all notes into a single document to share with Clery team.
- Meet with Clery team to review identified gaps and necessary changes. Assign working groups to address specific needs (policy updates, drafting or editing policy statements to reflect updates to policy, development of resources, etc.)

THINGS TO CONSIDER: ASSESSMENT OF PREVIOUS YEAR'S ANNUAL SECURITY REPORT

When determining who on the team will take the lead in reviewing each specific section, make sure to include individuals who are involved in implementing the actions identified within the particular policy statement. For example, if the representative from the Office of Student Conduct does not play a role in disseminating timely warnings, that person may not be familiar enough with the campus process to know if the information within the timely warning policy statement is complete or accurate. Remember that policy statements must align with existing campus policies, so it is important that the information within the annual security report not only meets the requirements of the law, but is also in line with actual policies and procedures on the campus.

Phase 3: Compilation of Crime Statistics for Annual Security Report

- Identify individuals from multi-disciplinary team who will compile crime statistics for the annual security report.
- Review statistics within previous annual security report. Document any changes that should be reflected in this year's ASR. (Were any incidents unfounded? Was any information inaccurate?)
- Review and compile reports of Clery Act crimes in Clery geography reported to local law enforcement or campus security authorities for the previous year.
- Request statistics from local law enforcement that have jurisdiction in Clery geographical areas.
- Compile statistics in appropriate format to insert into annual security report (narrative format for hate crimes, tabular format for the remaining crimes).

THINGS TO CONSIDER: COMPILATION OF CRIME STATISTICS FOR ANNUAL SECURITY REPORT

Assessing whether a report is a Clery Act crime and compiling statistics for the annual security report will occur on a continual basis throughout the year, particularly because these statistics connect to many other Clery requirements, such as timely warnings and the daily crime log. Where and how these statistics are compiled and reviewed will vary from campus to campus depending on the size and reporting mechanisms used at each institution. Regardless, it is important to include the compilation and organization of statistics into a Clery project plan so that any necessary final steps as well as requests to local law enforcement agencies take place. Remember that these statistics are also submitted directly to the Department of Education using a web-based data collection tool. The statistics within an institution's annual security report should align with the statistics submitted to the Department.

Phase 4: Development of Report

- Working groups address gaps from previous year's annual security report through policy and/or procedure updates and drafting or editing policy statements.
- Working groups submit final drafts of policy statements and statistics. Policy statements should reflect existing policies on campus.
- Project lead organizes information into singular, comprehensive document.
- Project lead does initial review of document using Clery Act regulations and any other additional resources used for assessment (training materials, checklists, etc.). Project lead drafts list of possible remaining gaps, areas of concern, or questions.

THINGS TO CONSIDER: DEVELOPMENT OF REPORT

Policy and procedure updates take time and often require external approval. Institutions should consider the implications of potential policy updates when drafting a timeline for implementation. The Clery team may need to engage individuals outside of the team, particularly those in leadership roles, if full policy updates are necessary to meet the requirements.

Phase 5: Review of Report

- Project lead provides compiled annual security report draft to Clery team.
- Each member of Clery team reads draft annual security report, compiles list of questions and observations, and submits list to the project lead.

- Project lead schedules meeting of Clery team for review of the annual security report and shares complete list of gaps, areas of concern, or questions from and to the entire team.
- Clery team meets in person to address questions and remaining needs for the report.
- Project lead makes final changes and edits, including adding page numbers and a table of contents.

THINGS TO CONSIDER: REVIEW OF REPORT

Clery team members will best be able to contribute to developing the annual security report if they are informed and prepared. With that in mind, the project lead should make sure to coordinate schedules so that all necessary parties can be present at meetings. It is helpful to provide an agenda and content for review prior to scheduled meetings. All parties should understand their roles in relation to the team and what's expected of them for each meeting. Do they need to accomplish a task prior to the meeting? Is there information they should bring with them to the meeting in order to answer specific questions? Giving individuals the information they need ahead of time will create more efficient, productive meetings.

Phase 6: External Review of Report

- Project lead shares the draft annual security report with external members of the campus community (a few colleagues, students, etc.)
- Ask external reviewers to provide specific feedback on the organization and structure of the document, ease of locating information, readability, and comprehension. Reviewers should note if any information is unclear or confusing as well as what elements of the document they find most useful.

THINGS TO CONSIDER: EXTERNAL REVIEW OF REPORT

An external review of the annual security report from a few select members of your community can help you ensure that the ASR reads as a helpful, thoughtful document. In addition to being a Clery requirement, the annual security report is also a comprehensive tool for communicating the many steps your institution takes to keep the campus community safe. You're spending time putting this resource together, but it's only truly useful if people are reading it and can easily access the information that's most relevant to their needs. For example, survivors of sexual assault might turn to the ASR to decide what options are best for them moving forward. Does the ASR clearly outline what these options are and whom to contact? Does the language within the document represent a campus working hard to prevent crime and compassionately respond if and when an incident does occur?

As we know you are committed to protecting and supporting students and employees, use this step to confirm you've created a document that is truly a helpful tool for your campus community, a resource that won't just collect dust on a shelf but is instead designed to help people make choices to enhance their own personal safety as well as the safety of others.

Phase 7: Final Edits & Design

- Final integration of updates and feedback.
- Integration of design elements (cover, updated table of contents, pictures, etc.)
- Final review to ensure content remained intact during design phase.

THINGS TO CONSIDER: FINAL EDITS AND DESIGN

This phase will vary depending on the resources, size, and structure of the institution. This phase may include input and support from a Marketing or Design department, or the final iteration of the annual security report may require approval from a specific department. Consider your own campus process and resources available to you.

Phase 8: Dissemination of Report

- Identify method of disseminating report to all currently enrolled students and all employees (directly by publication and mailing or posting the annual security report on an Internet or intranet website and providing individual notice about the report to each student and employee.)
- Identify method of disseminating report to prospective students and employees.
- Prepare for dissemination (printing or uploading document, prepping preparing/loading contact information, testing systems, etc.)
- Disseminate by October 1.

PROJECT ASSUMPTIONS

The following assumptions were made in preparing the Project Plan:

- The institution will develop a multidisciplinary team for the compilation and dissemination of the institution's annual security report.
- Multidisciplinary team members will participate in necessary meetings and will be available as needed to complete project tasks and objectives with reasonable notice and established timelines.
- Failure to identify changes to draft deliverables within the time specified in the project plan will result in project delays.
- Multidisciplinary team members will adhere to the Internal Communications Plan.
- The Project Plan may change as new information and issues are revealed.

RISK ASSESSMENT

The Risk Assessment (below) helps you identify and anticipate potential challenges to approaching this project and identifies potential strategies to mitigate those challenges.

The **Risk Assessment** will be continuously monitored and updated throughout the life of the project.

Risk	Risk Level (L/M/H)	Likelihood of Event	Mitigation Strategy
Person Hours	H	Certainty	Comprehensive project management approach and communications plan
Estimated Project Schedule	H: Over 9 Months	Certainty	Comprehensive project timeline with baseline reviews
Clery Team Communication Gaps	M	Somewhat likely	Comprehensive communication plan, consistent meeting/communication
Changing Project Deliverables	M: Not clearly defined	Somewhat likely	Clear ongoing communication
Timeline Estimates Unrealistic	M: Timeline assumes no derailment	Somewhat likely	Timeline to be reviewed carefully at each phase
Clery Team Members Unknowledgeable About Specific Aspects of Compliance	M: Knowledge depends on ongoing communication	Somewhat likely	Identify knowledge gaps and provide information as needed, regular check-in related to project
Absence of Commitment Level	L: Understands value & supports project	Unlikely	Frequently seek feedback to ensure continued support
Team Availability	H: Conflicting Priorities	Likely	Schedule timeline with conflicts in mind, continuous review of availability when setting deadlines
Number of Team Members and Conflicting Schedules Limit In-Person Meetings	M:	Likely	Use of e-mails, Google Docs, Comprehensive Planning; Create smaller working groups as needed

THINGS TO CONSIDER: PROJECT ASSUMPTIONS AND RISK ASSESSMENT

The Project Assumptions and Risk Assessment sections of the project plan provides an opportunity to have an upfront conversation about roles, expectations, and possible challenges as the team begins their work on the annual security report. Team members can communicate if there are any potential challenges that were not yet addressed and identify possible solutions. The goal is to make sure everyone is on the same page and clearly understands what to expect over the next few months of planning.

PROJECT MANAGEMENT APPROACH

Project Timeline

Please see the formalized project timeline for full project dates.

Estimated Completion Date	Milestone
XX/XX/XXXX	Phase 1: Formulation of Clery Team
XX/XX/XXXX	Phase 2: Assessment of Previous Year's Annual Security Report
XX/XX/XXXX	Phase 3: Compilation of Crime Statistics for Annual Security Report
XX/XX/XXXX	Phase 4: Development of Report
XX/XX/XXXX	Phase 5: Review of Report
XX/XX/XXXX	Phase 6: External Review of Report
XX/XX/XXXX	Phase 7: Final Edits & Design
XX/XX/XXXX	Phase 8: Dissemination of Report

PROJECT ROLES & RESPONSIBILITIES

Role	Responsibilities	Name/Title
(Sample) Project Lead	<ul style="list-style-type: none">• Manage project in accordance to plan• Schedule Clery Team meetings• Draft agendas• Direct team members toward project goals	<ul style="list-style-type: none">• John Doe, Clery Compliance Coordinator
[Insert role]	[Insert responsibilities]	Name, Title
[Insert role]	[Insert responsibilities]	Name, Title
[Insert role]	[Insert responsibilities]	Name, Title

THINGS TO CONSIDER: PROJECT MANAGEMENT AND APPROACH

The project roles and responsibilities section is a good space to specifically draft where and how each Clery team representative will play a role in the development of the annual security report. Not every department will be involved in drafting each part of the report, so this section will clarify each person's contribution. The project plan then serves as a tangible reminder of expectations and roles as each phase occurs.

INTERNAL COMMUNICATIONS PLAN

Disseminating knowledge about the project is essential to the project's success. This plan provides a framework for informing, involving, and obtaining buy-in from all participants throughout the duration of the project.

Audience

This communication plan is for all Clery team members.

Communications Outreach

The following is a list of communication events that are established for this project:

- **Monthly Status Reports:** The project lead shall provide monthly written status reports to all Clery team members. The reports shall include the following information tracked against the Project Plan:
 - » Summary of tasks completed in previous month
 - » Summary of tasks scheduled for completion in the next month
 - » Summary of issue status and resolutions
- **Meetings:** Meetings will be scheduled as needed by the project lead.
- **Shared Project Information:** In addition to information shared in e-mails or in person by the project lead, current project documents can be located here [insert web address.]

FOR MORE INFORMATION:

Please contact the project lead, John Doe, by e-mailing jdoe@institution.edu or by calling (XXX) XXX-XXXX.