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A CASE STUDY OF THE IMPLEMENTATION OF THE NEW CLERY ACT GUIDELINES

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A CASE STUDY OF THE IMPLEMENTATION OF THE NEW CLERY ACT GUIDELINES

by

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Dedications

This dissertation is dedicated to my loving and supportive family. To my amazing husband, Olalekan Adigun, for standing by me and supporting me throughout my doctoral program. For my wonderful children, Samuel and Esther, for your understanding and care during this period. To my parents, I want to say thank you for encouraging me to go and maximize my potential. You helped with childcare and babysitting throughout my studies; I would not have accomplished this without your help. Thank you for your prayers and encouragement.

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Abstract

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The Clery Act requires all higher education institutions participating in federal

financial aid programs to keep and disclose campus crimes by submitting an Annual

Security Report by October 1st of every year. In October 2020, the U.S. Department of

Education replaced the 265-page Clery Act guidelines for administrators with a 13-page

Appendix with specific changes to geographical locations to include in the report,

eliminated the definition of crimes, and limited individuals designated as Campus

Security Authority to those with direct responsibilities over student affairs. This case

study examined how campus security officers implement the new Clery Act guidelines in

crime reporting. The findings indicate that the guidelines prompted procedure changes in

response to the new Clery Act guidelines. In addition, this study assists in expanding the

limited research on implementing the Clery Act guidelines by serving as a model for

other institutions and a reference for Clery Act officers.

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Chapter 1

Introduction

Crime on college campuses has attracted national attention and challenged the traditional role of colleges as safe havens for students amidst the highly publicized trials of campus crimes and allegations that institutions mishandled reports that should have protected students (Nobles, Fox, Khey, & Lizotte, 2013). Usually, higher education institutions have an image of a safe environment as college campuses are relatively safe with less crime compared to the community. Sloan (1994) reported that crime reported on college campuses is lower than the crime reported in the general population. However, the gradual increase in college crime threatens the role of college as a safe place for students. The last decade has seen a significant rise in crime rates on college campuses (U.S. Department of Education, 2016). Congress found that reported crime cases on some college campuses have risen steadily in recent years, especially violent crimes (HR 3344: The Crime Awareness, 1990). In 2016, 28,400 college crimes at higher education institutions were reported, compared to 27,600 criminal incidents in 2015, representing a 3 percent increase (U.S. Department of Education, 2019). The increasing pressure on higher education institutions about disclosure of crimes, unusual court cases against institutions, growing media attention, and lobbyists prompted the passing of the Student Right to Know and Campus Security Act in 1990, later renamed the Clery Act (Fisher, Cullen & Turner, 2002). The Clery Act requires all higher education institutions participating in federal financial aid programs to keep and disclose information about crimes on and around their campus community for the preceding three years.

In October 2020, the Department of Education ended the Handbook for Campus

Safety and Security Reporting, eliminating the Clery Act guidelines for administrators

(Murakami, 2020). The Department of Education replaced the 265-page Clery Act

handbook with a 13-page appendix to the Federal Student Aid Handbook (Carter, 2020).

Higher education institutions must implement changes in response to the new Clery Act

guidelines. The political and legal conditions profoundly influence higher education

institutions and the neglect of Federal and State government policies and rules usually

has consequences. For example, Michigan State University had to change its procedures

for investigating sexual violence on campus after being fined $4.5 million for non-

compliance with the Clery Act. The institution had to hire an external consultant to

review previous decisions on sexual abuse cases at the University and determine if the

cases complied with appropriate legal standards (Bauer-Wolf, 2019). Introducing a new

policy makes organizations adopt best practices to obtain legitimacy by conforming to the

institutional and external environments (Scott, 2014).

Statement of the Problem

Over the past 30 years, the Clery Act guidelines have undergone several changes.

Higher education institutions must constantly adapt to the changes to avoid lawsuits,

settlements, and investigations by the Department of Education (Gregory & Janosik,

2013). In 1991, the Higher Education Technical Amendments changed the period for

reporting crime statistics from a calendar year to an academic year (Holder, 2017). In

1992, the Higher Education Amendments 1992 amended the Clery Act to require higher

education institutions to develop and implement policies and procedures to protect the

rights of sexual assault survivors. It was amended in 1994 to clarify that higher education

institutions may disclose registered sex offender information without violating privacy. In 1998, Congress made amendments to clarify the ambiguity in the Clery Act requirements. First, it expanded the reporting categories to include arson and negligent manslaughter. The modifications required geographic breakdowns for reporting crime on college campuses and residential buildings for students on and off campus. Second, it expanded the location to cover residence halls and all public properties the institution uses for educational purposes (Fisher et al., 2002). Third, it mandated that the campus security or police department keep a daily crime log. The record-keeping requirements changed the guidelines and required the distribution of a security report on October 1st of every year. The Higher Education Amendments of 1998 renamed the law in memory of Jeanne Clery and increased the categories of crimes. In 2000, the Victims of Trafficking and Violence Prevention Act amended the Clery Act, requiring higher education institutions to provide information on the location of the state's public sex offender registry (McCallion, 2014). Additional amendments to the Clery Act through the Higher Education Opportunity Act of 2008 required higher education institutions to develop and advertise immediate campus emergency response and evacuation procedures. In 2013, the Violence Against Women Reauthorization Act (VAWA) incorporated provisions from the Campus Sexual Violence Elimination Act and expanded reporting of dating-related crimes. It required reporting bias-related hate crimes under new categories: larceny, simple assault, intimidation, and vandalism of property (U.S. Department of Education, 2016).

There have been allegations that higher education institutions fail to act appropriately to prevent crimes, and administrators mishandle reports that should have protected students (Nobles et al., 2013). Parents and crime prevention groups maintain

that colleges and universities deliberately fail to report crimes to cover the institution's image and advocate that institutions accurately publish crime statistics while taking measures to prevent and respond to campus violence (Keels, 2004). Researchers must determine whether the Clery Act effectively reduces campus crime or enlightens students and employees about crime statistics (Fisher et al., 2002). In reporting campus crime, the media alleges that higher education institutions are not taking appropriate measures to address violence on the college campus (Lighty, Clair, & Cohen, 2011). Campus security officers claim that they are putting in all efforts to ensure compliance with the Clery Act (Nicoletti, Spencer-Thomas, & Bollinger, 2001). College administrators argue that the Clery Act is complex and ambiguous because the constant changes keep broadening the scope of the law, which has contributed to the errors, inaccuracies, or omissions in reporting crimes (Hanson & Cartwright, 2017).

Despite arguments about the Clery Act, campus security officers agree that the frequent changes and amendments to the Clery Act created confusion about Clery Act reporting that has generated penalties for higher education institutions (Carter, 2011). For example, Pennsylvania State University (Penn State) was fined a total of $2,397,500 for failing to make appropriate changes to conform to the Clery Act's requirements when it did not issue an emergency notification to the students and staff after the administrators learned of the child sex abuse scandal against Jerry Sandusky. The institution did not include the required policy statement in its Annual Security Report, correctly classify and disclose crime statistics, timely distribute the Annual Security Report in 2011, and failed to notify prospective students and employees (U.S. Department of Education, 2016). Recently, Michigan State University was fined a historic $4.5 million for failing to report

sexual violence and abuse of hundreds of students by former team doctor Larry Nassar. Administrators intentionally concealed his behavior or ignored reports from his victims, leading to the resignations of various high-ranking administrators and athletic officials at the University. The University failed to disclose Nassar's sex crimes, did not take appropriate actions, or issued public warnings to the campus community as required by the Clery Act (Bauer-Wolf, 2019). Higher education institutions must change their procedures and policies to adapt to the new Clery Act guidelines to avoid exposure to lawsuits and undue publicity (Smith, 1996). DiMaggio and Powell (1991) argued that specific forces might emerge to influence an institution to make changes and develop practices adopted by the institution. Therefore, it was necessary to examine how administrators approach and think through implementing the new Clery Act guidelines, how their practices become embedded to become routine, and measures used to sustain the changes (May & Finch, 2009).

Purpose of the Study

This study examined how campus security administrators implement the new Clery Act guidelines in campus crime reporting. According to May (2015), the first stage of a policy implementation process begins with the policy decisions of the implementing agencies. The implementation of a mandate begins with the response of the implementation officers. Administrators have to make sense of the new guidelines and plan how to implement the changes. Individuals' sense-making and understanding of practice will promote or hinder the effective implementation of a practice (Finch et al., 2012). Implementing the new Clery Act guidelines is based on the meaning and planning of administrators. The Clery Act handbook that higher education institutions have relied

on since 2005, which gives a step-by-step guide for higher institutions to ensure

compliance with the Clery Act, has been rescinded (Department of Education, 2020). The

Department of Education replaced the 265-page Clery Act handbook with a 13-page

Appendix that briefly summarizes some statutory and regulatory requirements (U.S.

Department of Education, 2020). Administrators have to understand and make sense of

the new guidelines to be able to plan accordingly. Higher education institutions have to

work out the participation of implementation officers as part of their planning process.

Participation involves the process by which organizations encourage individuals to

engage with a new practice (Finch et al. 2012).

This study examined the procedures employed by higher education institutions to

report and collate campus crime in response to the new Clery Act guidelines. The

Department of Education removed all definitions for Clery crimes as specified in the

2016 Clery Handbook and replaced them with references to regulatory sources

(Armentrout, Hanson, & Samples, 2020). In the new guidelines, the Department of

Education will accept a reasonable interpretation of crimes by higher education

institutions if defined in the Clery Act report (Carter, 2020). There needs to be

information about how higher education institutions interpret crimes included in the

annual Clery Act report. The Department of Education no longer applies specific,

measurable distance to determine geographical areas included in the Clery Act report

(Armentrout et al., 2020). Higher education institutions must determine and justify crime

statistics for locations reported in the Clery Act. The Appendix eliminated all

explanations and definitions of public property in the Clery Act Handbook. It canceled

higher institutions' requirement to report incidents at institution-sponsored trips and

international destinations. The recent changes by the Department of Education expect higher education institutions to use reasonable interpretations to determine geographical locations like public property, non-campus buildings, and off-campus locations included in the Clery Act reports (Carter, 2020). The handbook described Campus Security Authority (CSA) as campus police, security department personnel, individuals or organizations identified in institutional security policies, and individuals with security-related responsibilities (Department of Education, 2020). It referred to all those responsible for students and campus activities as Campus Security Authority, who are mandatory reporters of campus crimes.

On the other hand, the Appendix only requires a person with significant responsibilities for student and campus activities to be designated as a campus security authority. Therefore, the Department of Education will accept individuals selected by an institution as Campus Security Authority (CSA) (Department of Education, 2020). The new Clery Act guidelines became effective on January 1st, 2021, and little is known about how the changes to the Clery Act guidelines have affected campus crime reporting. However, this study provides insights into how the recent changes affected Clery Act reporting.

This study examined the strategies used by administrators to evaluate their implementation of the new Clery Act guidelines in campus crime reporting. Individuals in a set of practices can seek to determine the effectiveness of their method of practice (May et al., 2015). Regulations can lead to adopting strategies where critical organizational actors change internal structure and procedures (Kellogg, 2011). This section examined methods used to imbibe the new guidelines in the institutional culture.

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Institutions may only comply with the Clery Act guidelines if they take appropriate actions to sustain and reinforce procedures. McNeal (2007) identified that most Clery Act issues result from a need for proper strategies and formal structure for Clery Act requirements. Higher education institutions must implement appropriate practices and make changes to ensure accurate Clery Act reporting. Institutions must strategize to prevent crimes in the campus community while keeping up with the requirements of the Clery Act. Campus security is required to set up a security and incident reporting process and coordinate and monitor the reporting of crimes within the campus community. According to Jennings et al. (2007), campus crimes may undermine the institution's standard and hinder positive interactions within the campus community. This study investigated the strategies used to sustain the changes to campus crime reporting and new measures taken to support the changes.

Fisher and Sloan (2013) indicated that much of the research on campus crime reporting and security policies reveals that most compliance officials complied with Clery Act reporting requirements. However, unintentional mistakes occurred due to the frequent changes to the reporting requirements. Campus security officers collect crime statistics, keep records, and implement safety measures as specified by the Clery Act requirements. Hence, they are at the forefront of ensuring compliance with the Clery Act. This research analyzed direct information using the words, phrases, and comments from campus security officials to gain insight and understanding of the implementation of recent changes to campus crime reporting. This research provides insights for campus security officers and university administrators on how institutions have implemented changes to the Clery Act guidelines. The knowledge acquired from this study gave

insight into implementing the new Clery Act guidelines in campus crime reporting. It evaluated how higher education institutions interpret Clery Act regulations and help achieve a safer campus community.

Research Questions

This study examined research questions designed to provide an in-depth analysis of the impact of changes to the Clery Act on higher education institutions. Cousin (2005) identified that research questions are the main points that guide the extent of the study. Therefore, the following questions guided this study.

1. How do campus security officers implement the new Clery Act guidelines in crime reporting?

2. What are the reporting procedures in response to the new Clery Act guidelines?

3. What strategies do higher education institutions use to evaluate the implementation of the Clery Act guidelines?

Significance of the Study

The issue of campus crime has generated a nationwide dialogue with allegations that higher education institutions are failing to make appropriate changes that could have prevented crimes and protected students (Nobles et al., 2013). The Clery Act requirements frequently changed to simplify the policy, but each amendment needed clarification (Gregory & Janosik, 2002). The increasing reports of violent crimes on college campuses are of great concern to all stakeholders in higher education. In 2011, the first National Summit on Campus Safety for college and university presidents met to

discuss the issue of campus safety (U.S. Department of Justice, 2011). The highly publicized trials of campus crimes, lawsuits, settlements, investigations, and fines made news headlines and attracted media attention. The undue attention may adversely affect institutions, and the negative publicity could decrease enrollment and Alumni donations (Janosik & Gregory, 2003). Several university administrators and employees have resigned or been relieved from their positions because of allegations of coverup and failure to report crimes in their institutions. The former Michigan State University President and former Penn State President stepped down from their positions. Michigan State University fired the gymnastics coach for the coverup of allegations against the team doctor, and the Penn State Board of Trustees fired the athletic director of Penn State with the former head football coach after a failure to follow up on reports made to them (Corrigan, 2018). College administrators risk losing their jobs for not addressing campus crime appropriately, and institutions may incur significant damage to their reputations (Mencarini & Hinkley (2018).

Higher education institutions risk losing federal funding for failure to adapt to the ever-changing Clery Act requirements (U.S. Department of Education, 2016). Besides, the financial burden due to violations of the Clery Act is high, and the cost for a single violation increased to $58,328 (Clery Center, 2020). In 2017, Penn State University's final settlement in Jerry Sandusky's case reached $109 million, 2% of the institution's Department of Education budget (Corrigan, 2018). In addition, Penn State University incurred $30 million in legal fees and $60 million from fines issued by the National Collegiate Athletic Association (Mencarini & Hinkley, 2018). Recently, Michigan State University was fined 4.5 million for not taking appropriate changes in conformity with

the Clery Act guidelines. The University also agreed to a $500 million settlement with

332 of Larry Nassar's victims, making the settlement 37 percent of the University's

budget. The annual general fund budget for Michigan State for 2017/ 2018 was $1.36

billion (Mencarini & Hinkley, 2018). This study is of great significance to enlighten

college administrators about past negligence in addressing crime on college campuses to

prevent costly mistakes that can cost them their jobs and avoid investigations, fines, loss

of federal funding, and unavoidable hefty fines.

We need to examine the implementation of the recent changes to the Clery Act

requirements on higher education institutions because we have yet to find another study

on the subject. Higher education institutions have faced accusations of manipulating

campus crime statistics to protect their reputation and boost enrolment (McNeal, 2007).

This study exemplifies how the changes influence higher education institutions to fulfill

their obligations to campus safety and meet the Clery Act's demands. In addition,

according to Fisher and Sloan (2013), most research on campus crime reporting revealed

that higher education institutions are prone to unintentional errors in reporting campus

crime statistics because of the frequent changes to the Clery Act guidelines. Therefore,

this study is of great significance in providing an in-depth analysis of the implementation

process of the Clery Act guidelines and serves as an example for other institutions to

work to implement the new Clery Act guidelines.

Definition of Terms

Annual Security Report – This is a Clery Act requirement for higher education

institutions that receive federal funding to disseminate reported crime statistics, security

policies, and procedures to the campus community every October 1st for the preceding three years (Fisher & Sloan, 2013).

Campus Crime - Refers to all aggressive, illegal, violent, and defiant behaviors occurring on universities and college campuses. Campus crime involves breaking laws or rules by college and law enforcement authorities.

Campus Security Authority - any person or organization associated with higher education institutions that must report criminal activity (Kiss, 2013).

Campus Security Officers – refers to campus police, security department, or individuals entrusted with the responsibility of campus security to whom students and employees should report criminal offenses.

Clery Act - This is a federal statute requiring all colleges and universities participating in federal financial aid programs to keep and disclose information about crime on and around their campus community for the preceding three years.

Campus Law Enforcement – Include all higher education institutions' campus police and security officers responsible for collecting, publishing, and reporting campus crime statistics on college campuses (Wood & Janosik, 2012).

Compliance - can be defined as following applicable case law and accreditation standards in addition to the institution's policies, procedures, and contractual obligations, such as employment contracts, business contracts, or collective bargaining agreements if a union is involved.

Crime Log - is a record maintained by college and university police or safety departments that provides up-to-date accounts of reported criminal activity (U.S. Department of Education, 2016).

Department of Education – This United States Federal Government branch investigates the Clery Act complaints, compliance, and resolution (Kiss, 2013).

Family Education Rights and Privacy Act (FERPA) – is a United States Federal law that governs access to educational information and records by public institutions.

Higher Education Institutions – Includes all postsecondary institutions in the United States of America.

Implementation ensures that the specific objectives of a policy decision are met (Mazmanian & Sabatier, 1991).

The International Association of Campus Law Administrators (IACLEA) - is an organization that represents and promotes campus safety (McNeal, 2007).

The Handbook for Campus Safety and Security Reporting – Is a collection of guidelines from the Department of Education compiled to assist compliance officers in adhering to the Clery Act reporting requirements (Gregory & Janosik, 2013).

Title IV is a federal regulation that administers the disbursement of student financial aid and monitors participating postsecondary institutions (U.S. Department of Education, 2016).

Title IX - is a federal regulation that guides oversight of civil rights issues, especially gender equality (U.S. Department of Education, 2016).

Uniform Crime Report (UCR) – is a Federal Bureau of Investigation (FBI) database that publishes annual statistics on various crimes.

Summary

Although campus crime rates are generally lower than crime in the community, the increasing crime rate greatly concerns students, parents, faculty, and staff accepting admission and employment opportunities (Nobles et al., 2013). The Clery Act was enacted by Congress to enhance student safety and to hold higher education institutions accountable for failing to publish accurate crime statistics and security policies (Fox et al., 2012). This study examined how Clery Act administrators implement the new guidelines in campus crime reporting. It looked at the sense-making and planning involved in implementing the new policy and how the recent withdrawal of the Clery Act handbook has affected campus crime reporting in higher education institutions. The Department of Education rescinded the manual written to give a step-by-step guideline for higher education institutions to ensure compliance with the Clery Act in October 2020. Higher education institutions must implement changes with each amendment to the Clery Act (Dobbin & Kelly, 2007). This study investigated how administrators describe their procedures in response to the new Clery Act guidelines. In addition, it examined the strategies employed by administrators to implement the new Clery guidelines in campus crime reporting. Information from this study will assist with effective policies and security measures to limit liability (Wood and Janosik, 2012). The findings in this study provide insight into the implementation procedures and the impact of the recent changes of the Clery Act on higher education institutions, significantly promoting campus safety.

Chapter 2

Literature Review

The increases in violent crimes in higher education institutions prompted the Federal government to enact laws under the Clery Act mandating colleges and universities to publish their crime statistics and security policies. However, the constant changes to the law have created concerns for higher institutions (Solovay, 2016; Wood & Janosik, 2012). Several violent crimes in the 1970s and 1980s on higher education institution campuses created awareness of the vulnerability of students to violent crimes (Kaplin & Lee, 2007). Previously, the court rulings mainly favored higher education institutions, but in recent times, institutions have been held liable for damages related to violent crimes on campus (Daly, Keller, Lewis & Sokolow, 2008). Higher education institutions were responsible for violence or injuries to students, especially when there was a trend or history of criminal activity in the campus community (Kaplin & Lee, 2007). Colleges and universities should protect their students and provide a safe campus community (Daly et al., 2008). Higher education institutions risk losing federal funding if they fail to comply with the Clery Act. In addition, some institutions have litigations, monetary fines, and settlements. Recently, the University of Utah reached a $13.5 million settlement with the parents of a University of Utah track athlete killed in 2018 by her ex-boyfriend on campus after acknowledging that the university did not handle the case properly (McCombs, 2020). Lauren McClusky had contacted the university police more than 20 times to report harassment by her ex-boyfriend before he fatally shot her in a car near her on-campus student housing in October 2018. The case brought new national

attention to campus safety and the failure of institutions to take appropriate actions to protect students.

This literature review gives an overview of campus crimes and discusses the history of the Clery Act. It examined crime reporting before the Clery Act to provide more enlightenment about campus crimes and how institutions handled campus crimes before the Clery Act. The first section of this chapter gives a background of campus crimes and what led to establishing the Clery Act. The following section provides an account of the Clery Act requirements and the implementation of the Clery Act. Next, it examines the specific provisions of the Clery Act and the implementation of the Clery Act by higher education institutions by reviewing studies on the awareness of the Clery Act by students, parents' awareness of the Clery Act, and the impact of the Clery Act on students' behavior. The final section of the literature review used the Normalization Process Theory to examine how administrators implement the new Clery Act guidelines.

Overview of Campus Crime

Historical evidence shows that college crimes date back to the beginning of higher education in America during the 17th century. Early accounts of college students show that students were engaging in various inappropriate behaviors, like first-year students acting as servants for upperclassmen, drinking heavily, and rowdiness (Sloan & Fisher, 2011). During the 17th-20th centuries, violent assault, lynching, murder, rapes, vandalism, and riots were common on college campuses. Some of the unrest in higher education then was centered around social events like the civil rights movements and the Vietnam War. By the 1900s, crime on college campuses was no longer an extension of

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earlier social activities because binge drinking and violence against women were rampant (Weiss, 2013). There was an increase in campus crime in the 20th century because of an expansion of several colleges due to a rise in the number of students accessing higher education institutions. As the population of college students increased during the 20th century, the number of college crimes also increased significantly (Sloan & Fisher, 2011).

The most rampant campus crimes are binge drinking, underage drinking, and drug abuse. Other severe crimes on college campuses are murder, burglary, robbery, vehicle theft, and sexual assault (Sloan & Fisher, 2011). Burglary and theft are common crimes on college campuses. Hazing has occurred frequently on college campuses, which has resulted in deaths. Some studies claim that peer pressure is a significant cause of theft and burglary, while some researchers claim that the primary reason for theft and burglary is still uncertain. Cases of sexual assault have increased significantly in most higher education institutions (Schwartz & DeKeseredy, 1997). Alcohol abuse and other substance abuse have contributed hugely to increased crime rates. Most students involved in sexual assault cases have reported being influenced by alcohol and substance abuse to perpetuate these crimes (Sloan & Fisher, 2011). Statistics reveal that 85 percent of all campus crime and violence were student-to-student crimes, and approximately 60 percent were due to alcohol (H.R.: 3344: The Crime Awareness, 1990). Greenfield (1998) identified that one in five violent crimes involved alcohol use by the offender. The U.S. Department of Justice indicated that three percent of college women experienced rape or assault during a typical academic year (Sloan & Fisher, 2011). Crimes such as sexual assaults and murder destabilize and affect students psychologically. Most students who

have been victims of such crimes show signs of withdrawal and perform poorly

academically, while some drop out of college (Sloan & Fisher, 2011).

Several movements emerged during the 1970s and 1980s to create awareness

about crime on college campuses. The Feminist movement and rape-law-reform

movement emerged in the 1970s. A pioneering national study by Mary Koss confirmed

that many college women had been victims of unwanted sexual contact, sexual coercion,

and rape within the last year of the study (Fisher et al., 2002). In addition, many campus

crime victims filed several civil lawsuits claiming that higher education institutions failed

to provide a safe and secure campus. Public attention has focused on on-campus crimes

in recent decades because of the public and media coverage of victims of campus

violence who often sue the institution for damages arising from the incident. Recently,

the focus has shifted from holding students accountable for their actions on campus to

holding institutions accountable to protect students in the campus community (Sloan &

Fisher, 2011).

Previously, higher education institutions were required to report crimes that

occurred on college campuses voluntarily. Before 1990, the only official database for

campus crime statistics issued by the Federal Bureau of Investigation (FBI) was The

Uniform Crime Report. Only 10 percent of higher education institutions reported crimes

on college campuses (Cockey, Sherrill, & Cave, 1989). Of about 8,000 higher education

institutions participating in Federal student aid programs, just 352 colleges and

universities voluntarily provided crime statistics to the Federal Bureau of Investigation's

Uniform Crime Report (H.R.: 3344: The Crime Awareness, 1990). The policy of

voluntarily reporting campus violence ended due to an incident at Lehigh University in Pennsylvania that introduced a new era of reporting campus crime.

On April 5th, 1986, a fellow student beat, raped, and murdered nineteen-year-old freshman Jeanne Clery in her dorm room at Lehigh University. Jeanne Clery's parents investigated and discovered that thirty-eight violent crimes had occurred on the campus for three years before Jeanne's death, and the information was not made public (Sloan & Fisher,1995). In 1986, there was no standard for reporting campus crimes (Clery, 2020). The Clerys sued the university for failing to provide adequate security and failing to inform students of previous crimes on the college campus. They also began a national campaign for campus security laws. On Capitol Hill, they lobbied for policy changes, resulting in the Student Right to Know and Campus Security Act, which was later renamed the Clery Act (Sloan & Fisher,1995). The Clerys worked with allies and advocates to form a nonprofit organization to prevent the violence that killed Jeanne. The organization, Clery Center, is still dedicated to assisting higher education institutions in implementing effective campus safety measures (Clery, 2020). Public access to campus crime statistics has been available through the Crime Awareness and Campus Security Act of 1990 and its subsequent legislation, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, also known as the Clery Act (U.S. Department of Education, 2016). The purpose of the Clery Act was to ensure the disclosure of information essential for public safety on college campuses and to establish a standard procedure for reporting crime and security responses (Holder, 2017). This disclosure will notify those in the campus community to make informed decisions about their safety based on the relative safety or risk. There should be an affirmative statement

from students' rights, and institutions should promptly notify the campus community of potential threats to student safety once reported to the campus security officials (U.S. Department of Education, 2016).

Crime Reporting Before the Clery Act

Before the passing of the Federal legislation on on-campus crime statistics, very little information concerning campus crime was available (Fisher et al., 2002). One of the reasons for not submitting information was that higher education institutions had no mandatory requirements to report campus crime to the Federal Bureau of Investigations (FBI) Uniform Crime Reports. Official and victimization survey statistics are the two fundamental data sources for estimating the extent of crime in any social environment, whether in an entire country, state, city, or college campus (Fisher et al., 2002). Since 1930, the FBI has collated crime statistics from various law enforcement agencies nationwide that have voluntarily participated in the Uniform Crime Reporting (UCR) program (U.S. Department of Justice, 2020). Each year, the UCR publishes statistics on various crimes. In addition, the FBI and the Bureau of Justice Statistics have made a website available that allows users to customize their data tables. The UCR collects statistics on violent crimes like murder, manslaughter, rape, robbery, and aggravated assaults, including property crimes like burglary, larceny-theft, and vehicle theft (U.S. Department of Justice, 2020). Under each criminal offense, the FBI reports the frequency of crimes reported to police or crimes discovered by police or witnesses (Fisher et al., 2002). The UCR's statistics are usually different from the other national sources of crime statistics – The National Crime Survey and the National Crime Victimization Survey. The main limitation of the UCR is that it records only crimes reported to law

enforcement, which represents just a fragment of crimes that happen. For example, Fisher et al. (2002) identified fewer than five percent of sexual assault victims reported to law enforcement. In addition, reporting crimes depends on the type of crime. Sexual violence, especially rape, is the most underreported violent crime, while motor vehicle theft is the most frequently reported. Critics have claimed that crime statistics compiled by the police may manipulate incidents, cover up crime problems, lower certain crimes, and exaggerate others to boost their efforts (Fisher et al., 2002).

During that time, institutions voluntarily reported campus crime, but only a tiny percentage of all higher education institutions reported their crime statistics to the Uniform Crime Reports (UCR). For the year 1991, only 12 percent of higher education institutions reported crimes that occurred on their college campuses. The smaller number of institutions reporting their crimes resulted in inconsistent data. Some institutions said inconsistently; others reported for a year or two and stopped sending their reports. As such, the campus crime statistics from the UCR needed to be completed and accurate (Fisher et al., 2002). In addition, the Family Education Rights and Privacy Act (FERPA) interpretation, often called the Buckley Amendment, complicated and hindered access to campus crime statistics. FERPA is a federal law that protects keeping students' educational records private. With the support of the U.S. Department of Education, several higher education institutions used FERPA as a basis for refusing to disclose crimes that occurred on their college campuses. Quoting FERPA, higher education institutions claimed that their campus crime records contained the personal information of students, leading to a violation of privacy and could lead to a loss of Federal funds (Fisher, Hartman, Cullen, & Turner, 2002).

Some critics argue that some higher education institutions were attempting to be silent about crime on their college campuses. Others claim that higher education institutions are trying to cover up their campus crimes because they could lead to lawsuits and negative publicity (Fisher et al., 2002). By the early 1990s, campus and professional journalists sued higher education institutions to obtain campus crime statistics. In Campus Communications v. Criser, the court challenged the claim that FERPA helped cover up campus crime statistics. Also, in Bauer v. Kincaid, the courts claimed that disclosing campus crime incident reports and statistics was not educational records under FERPA (Fisher et al., 2002). In her congressional testimony, Dorothy Siegel, a faculty at Towson State University, revealed the results of the first national study of the extent of campus crime. Out of the survey of about 2000 students, about 1 in 3 reported being victims of at least one crime during their college campus experience. Almost 10% of the participants confessed to having committed a crime. Before Siegel's study and congressional testimony, only a few studies had investigated the extent of campus crimes. The handful of studies was limited as they examined crimes only on a college campus or a few campuses (Fisher et al., 2002).

The growing pressure on higher education institutions to disclose crimes, unusual court cases against institutions, and congressional testimony created more awareness about the right-to-know details concerning campus crimes (Fisher et al., 2002). In addition, the growing reports about violence on college campuses fueled the situation. The parents of Jeanne Clery capitalized on the momentum created by the congressional testimony, court cases challenging higher education institutions that FERPA did prevent disclosure of campus crimes, undue media attention, and the passage of crime reporting

legislation in Pennsylvania to lobby legislators. As a result, the Clerys successfully

lobbied Congress to pass legislation requiring higher education institutions to publish

their campus crime statistics and security policies (Clery, 2020). As a result, Congress

passed the Student Right-to-know and Campus Security Act in October 1990. It was

signed into law in November 1990 by President George Bush, and the administration of

the law rests with the U.S. Department of Education. Title II of the law, The Crime

Awareness and Campus Security Act of 1990, was later renamed the Clery Act

(Department of Education, 2016).

Clery Act Requirements

The Clery Act aims to protect college students, employees, and prospective

students by providing transparent campus crime policies and statistics. The Clery Act

states that students and employees of higher education institutions should be aware of the

occurrences of crime on campus with the policies and procedures to prevent crime

(Gregory & Janosik, 2006). The law claims prospective students should have access to

information about an institution's crime statistics and security policies and procedures. It

indicated a clear need to develop campus-wide security policies and procedures. To

comply with the Clery Act requirements, higher education institutions must understand

what the law entails, the responsibilities required from institutions, and how to promote

safety on college campuses (Clery Center, 2020). The Act calls for uniformity and

consistency in the reporting of campus crimes. It encourages the development of policies

and processes to address incidences of sexual assaults and racial violence on college

campuses (Fisher et al., 2002). Based on these goals and needs, the Clery Act specified

requirements that private and public institutions receiving federal funding must abide by

or face repercussions for non-compliance. The Clery Act requires higher education institutions to collect statistics and maintain a daily crime log, collate Clery Act crimes, send emergency notifications and timely warnings, and issue an Annual Security Report.

Collecting Statistics and Maintaining a Daily Crime Log

The Clery Act expects higher education institutions to compile crime reports from campus security authorities. It does not matter if the police or campus security authority has investigated the crime or if there were any findings; all reported crimes must be in the institution's crime statistics (U.S. Department of Education, 2016). Ideally, students are supposed to report crimes to law enforcement, but that is only sometimes the case. Some victims of a crime may report to someone other than the campus police, like the resident advisor or dormitory representative. Institutions must ask law enforcement for statistics of Clery Act crimes in any area of the Clery Act geography: on-campus, public property, and non-campus locations. The Clery Act regulations need to specify the crime reporting process or training campus security authorities should use despite their vital role in compliance with the law (RAINN, 2020). The Clery Act handbook gives the following recommendations, not requirements, that institutions can adopt: Higher education institutions can designate an individual or office to coordinate the campus security authority. They should ensure that individuals designated as campus security authorities know their roles and provide training. All crime reports forwarded to the campus police or security department must be recorded and included in the Annual security report (U.S. Department of Education, 2016).

Under the Clery Act, various arrangements make up a campus police or security department. For example, some institutions have a private company to handle campus security, and others have arrangements with municipal, county, or state law enforcement agencies for security services (U.S. Department of Education, 2016). Institutions should keep daily records of crimes reported to campus police or security personnel. The purpose of the daily crime log is to record all criminal incidents reported to the campus police or security department for the required geographic locations. The crime log should include the nature or classification of the crime, a case number, the date and time reported, the date and time when it occurred, the general location, and the disposition of the complaint if known (Clery Center, 2020). It involves an entry or change in the disposition of a complaint recorded within two business days of reporting the information to the campus security department. The crime log must be accessible on-site, and if there are multiple campus locations, separate records must be available or accessible at the other sites. The crime log must be a hard copy or electronic, and students and employees are notified of the public record, what it contains, and where it is (RAINN, 2020). The crime log for the most recent 60 days must be open to public inspection, free of charge, upon request, during regular business hours. Log details older than 60 days must be available within two days of a request for public inspection (U.S. Department of Education, 2016).

Collating Clery Act Crimes

The Clery Act specifies reportable crimes and the rules for classifying and counting them. The Clery Act requires higher education institutions to include four general crime statistics: Criminal offenses like homicide, murder, manslaughter, sexual

assault, rape, fondling incent, robbery, burglary, aggravated assault, motor vehicle theft, and arson. Hate crimes include robbery, theft, simple assault, intimidation, destruction/damage, or vandalism of property that were motivated by bias. VAWA offenses include domestic violence, dating violence, and stalking. Sexual assaults are to be included in the Clery Act statistics regardless of consent, as sexual assault is a criminal offense for reporting purposes. The final category consists of all statistics of arrests and referrals for disciplinary action for weapons, carrying, possession, law violations, drug abuse violations, and liquor law violations (Clery Center, 2020). Institutions must include all crime statistics of all reported offenses without regard to the findings of a court, coroner, jury, or prosecutor's decision (Gregory & Janosik, 2006). For example, the Clery Act classifies the use or threat of force as an element of robbery, and all assaults, either labeled misdemeanors or felonies, are included. Institutions must investigate reported incidents to determine their classification. For example, a person who steals from a place with open access is larceny, not burglary (U.S. Department of Education, 2016).

The Clery Act requires higher education institutions to disclose statistics for crimes reported based on where they occurred, the types of crimes reported, and the year they were reported (RAINN, 2020). Institutions must report if the crime occurred on campus, on public property within or adjacent to the campus, and on non-campus buildings or property owned or controlled by the institution. The definitions for the geographic categories are specific to the Clery Act, and they are the same for all institutions regardless of their physical size or configuration. Understanding each geographic category defined by the Clery Act is essential because it is vital to comply with the law. Under the Clery Act, the on-campus category includes reporting all crimes

that occurred in buildings and properties owned or controlled by the institution either directly or indirectly, such as rents, leases, or uses of a portion of a property, even if no payment is involved. Any building that directly supports or relates to the institution for educational purposes. A property owned by the institution, but even if the institution does not control it, it is used by the students and supports its educational purposes. For institutions with more than one campus, each campus must independently meet all the requirements of the Clery Act (U.S. Department of Education, 2016). Accurately defining what is on campus is vital for disclosing crime and correctly identifying other categories of the Clery Act geography, like public property. No matter where an institution's campus is, the Clery Act requires reporting all crimes on public property within the campus and public property that immediately surrounds or is accessible from the campus (Clery Center, 2020).

Sending Emergency Notifications and Timely Warnings

The Clery Act requires all institutions to have and disclose emergency response and evacuation procedures to respond to a significant emergency or dangerous incident involving an immediate threat to the safety of students or employees within the campus community (RAINN, 2020). Each institution should be sufficiently prepared for an emergency on campus, test the procedures to identify and improve weaknesses, and inform the campus community and parents in an emergency. Emergency or dangerous situations like an outbreak of meningitis, norovirus or other serious illnesses, approaching tornado, hurricane or other extreme weather conditions, earthquake, gas leak, terrorist incident, armed intruder, bomb threat, civil unrest or rioting, explosion, or nearby chemical or hazardous waste spill (U.S. Department of Education, 2016). The Clery Act

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requires higher education institutions to have procedures to test the emergency response

and evacuation process annually. In addition, the Clery Act requires institutions to alert

the campus community to certain crimes promptly, which will aid in preventing similar

crimes. The warning should be issued as soon as pertinent information is available, even

if all the facts surrounding a criminal incident that represents a serious and continuing

threat to the students and employees are not known a warning should be issued (RAINN,

2020). There is no required format for a timely warning. However, the notice must be

reasonable and likely to reach the entire campus community so that the word gets out

quickly and effectively. The notification is emailed, posted around campus, provided as a

text message, or distributed according to the institution's policy. Higher education

institutions must issue a policy statement about missing students for students residing in

on-campus student housing. They must include procedures the institution will follow if

any student is determined to be missing for 24 hours. The policy statement must specify a

list of individuals or departments to contact if they have reason to believe that a student

living in on-campus housing has been missing from campus for 24 hours. The emergency

contact information and missing student information are separated to protect

confidentiality (U.S. Department of Education, 2016).

Annual Security Report (ASR)

The Clery Act mandates all higher education institutions to publish and distribute

the annual security report by October 1st of every year. There are no grace periods, and

there are no exemptions. The ASR report uses guidelines specified in the handbook for

campus safety and security reporting, including all policy statements (Clerycenter, 2020).

Years reported must include data for the past three calendar years, entered separately.

The geography category consists of all required geographic locations (on-campus, public property, and non-campus) associated with the institution. The on-campus statistics must include statistics for on-campus student housing facilities (RAINN, 2020). Institutions without on-campus student housing facilities, non-campus buildings, or property must state that in the report. Crime categories must be listed separately, and zero if there are no crimes to disclose for a particular category (U.S. Department of Education, 2016). By October 1st of each year, ASR is available to all currently enrolled students, including part-time students and all employees, by October 1st. The prospective students or employees can receive the ASR upon request. The ASR should be distributed to enrolled students and employees directly by publications and mailings through the United States Postal Service or other direct mail services through campus mail or email. In addition, it is on an internet website accessible to enrolled students and current employees. Specifically, all higher education institutions must publish the ASR by the deadline, including the required policy statements, including three years' worth of Clery Act statistics, determine who gets the report, distribute the information, and retain records associated with the reports (U.S. Department of Education, 2016).

Changes to the Clery Act

Several changes to the Clery Act have occurred over the last 30 years. In 1990, George Bush signed the Clery Act into law, requiring all higher education institutions to record campus crime statistics with the institution's safety policies. The security reports are published and available for students, staff, and the campus community (Clery, 2020). In 1991, the Higher Education Technical Amendments changed the period for reporting crime statistics from a calendar year to an academic year (Holder, 2017). In 1992, the

Higher Education Amendments 1992 amended the Clery Act to require higher education institutions to develop and implement policies and procedures to protect the rights of sexual assault survivors. It was amended in 1994 to clarify that higher education institutions may disclose registered sex offender information without violating privacy. In 1998, Congress made amendments to clarify the ambiguity in the Clery Act requirements:

1. It expanded the reporting categories to include arson and negligent manslaughter.

2. The amendments required geographic breakdowns for reporting crime on college campuses and residential buildings for students on and off campus. In addition, it expanded the location to cover residence halls and all public properties the institution uses for educational purposes (Fisher et al., 2002).

3. It mandated that the campus security or police department keep a daily crime log.

4. Changes to the record-keeping guidelines require a security report published on October 1st of every year.

The Higher Education Amendments of 1998 renamed the law in memory of Jeanne Clery and increased the categories of crimes (Clery, 2020).

In 2000, the Victims of Trafficking and Violence Prevention Act amended the Clery Act, requiring higher education institutions to provide information on the location of the state's public sex offender registry (McCallion, 2014). The scope of the Clery Act expanded in 2008 to include an emergency response with increased notification and broader categories for hate crimes and protections for whistleblowers. Additional

amendments to the Clery Act through the Higher Education Opportunity Act of 2008 required higher education institutions to develop and advertise immediate campus emergency response and evacuation procedures (Clery, 2020). In 2013, the Violence Against Women Reauthorization Act (VAWA) incorporated provisions from the Campus Sexual Violence Elimination Act and expanded reporting to reporting dating-related crimes. In addition, it required reporting bias-related hate crimes under new categories: larceny, simple assault, intimidation, and vandalism of property (U.S. Department of Education, 2016). In October 2020, Betsy Devos ended the Handbook for Campus Safety and Security Reporting, eliminating the Clery Act guidelines for administrators (Murakami, 2020). The Department of Education replaced the 265-page Clery Act handbook with a 13-page document that briefly summarizes some statutory and regulatory requirements (U.S. Department of Education, 2020). Instead of the Clery Act Handbook, the replacement was a 13-page Appendix to the Federal Student Aid Handbook (Carter, 2020).

The changes in the new Appendix are specifically related to the Clery Act geography, campus crimes, and campus security authorities. First, higher education institutions have needed help with the complexities of Clery Act geography and have taken unnecessary steps to ensure compliance (Department of Education, 2020). First, the Clery Act handbook describes the geographic area as one mile from the campus border, but the Appendix no longer gives a specific measure for the geographical location (Juszkiewicz, 2020). Second, the Appendix removes the instructions for reporting campus crimes on public property and the concerns about reporting crimes that occur during international institution-sponsored trips (Nolan, 2020). Third, the new Appendix

deleted all definitions for campus crimes as specified in the Clery Handbook and leaves the interpretation of campus crimes to the discretion of higher education institutions (Department of Education, 2020). Fourth, the summarized guidelines for the Clery Act will adhere strictly to the definition of campus security authority (CSA) and accept an institution's determination of who constitutes a CSA. Finally, the Department of Education indicated that the handbook extended the description of campus security authority by including individuals who did not have significant responsibility for student and campus security (Juszkiewicz, 2020). The rationale for replacing the Clery Act handbook, which provided a step-by-step interpretation of the requirements, was considered controlling because it extended beyond the statutory and regulatory requirements (Juszkiewicz, 2020). The goal of withdrawing the Clery Act handbook was to reduce regulatory confusion and help simplify Clery compliance (Department of Education, 2020).

The recent changes to the Clery Act requirement permit higher education institutions to use their discretion regarding compliance (Murakami, 2020). Higher education institutions must determine and justify crime statistics for locations reported in the Clery Act. The recent changes by the Department of Education expect higher education institutions to use reasonable interpretations to explain terms in the Clery Act reports (Carter, 2020). The amendments clarified the Clery Act's ambiguity and the guidelines in the handbook to guide institutions. Higher education institutions still need to comply with all the requirements of the Clery Act. The recent changes that give little guidance to institutions have left more questions than answers for institutions. There have been concerns from advocates that data quality needs to improve as institutions use

various definitions (Murakami, 2020). Prompt actions and accurate reporting will equip

students with the necessary information to protect themselves (McNeal, 2007). The

inaction of higher education institutions may cause abuse, molestation, or death to many

more innocent students across the country. To simplify the Clery Act reporting

requirements, the Department of Education has increased the confusion concerns for

higher education institutions (Murakami, 2020).

One of the objectives of the Clery Act is to create awareness so that students and

parents can make informed decisions when choosing a college (Gregory & Janosik,

2006).

The Impact of the Clery Act

Gregory and Janosik (2006) sought to determine if the Clery Act has impacted

changing students' perceptions or behavior. First, the participants identified how the

policy has influenced how they protect themselves and their properties as they move

around campus. Only 15% of the participants indicated that the crime data affected how

they protected their properties, while 55% perceived no change in their behavior. Another

16% showed that the crime data resulted in a change of conduct regarding how they

protected themselves on campus. In comparison, 49% perceived no difference in how

they protected themselves due to the crime statistics. The third set of questions in the

study asked participants about perceived changes in their movement around campus as a

result of the available crime data. Only 14% of participants changed how they moved

around campus, while 57% perceived no change in their behavior because of the crime

data. While a small number of participants protected their properties considering the

crime data, 46% indicated that the protection of themselves and their properties was positively affected by the safety materials and programs distributed on campus. The study gave the impression that campus safety materials and programs on college campuses were perceived to be more effective in changing student behavior than the crime statistics in the Clery Act (Gregory & Janosik, 2006).

In the national study on the impact of the Clery Act on college student behavior, Janosik and Gehring (2003) investigated the voting delegates of the National Association of Student Personnel Administrators (NASPA), which represented a variety of institutions across the United States. Three hundred and five administrators (30.6%) volunteered to participate in the study. The participants came from 3 two-year private institutions (1%), 30 two-year public institutions (10%), 137 four-year private institutions (45%), and 135 four-year public institutions (44%). Each administrator got a stratified random sample of 30 students in the study proportionate to the number of students on each campus. A total sample of 9,150 students participated in the study. The study examined students' knowledge about the Clery Act and found out if specific changes occurred in students because of the crime prevention programs in their institutions and awareness of information in the Annual Security Report (ASR). In addition, the study asked participants to indicate if they felt safe on campus and in the surrounding areas on their respective campuses.

Despite the efforts by higher education institutions to create awareness and distribute the annual security report more widely, most of the students indicated that they needed to be made aware of the Clery Act, with only 27% of the participants indicating that they knew about the Clery Act. Only 24% of respondents reported receiving a

summary of their institution's security report with their admissions materials. Just 8% of participants used the summary of the Clery Act data in selecting a college or university to attend. Generally, students tend to use other sources of information to acquaint themselves with crime on campus. For example, 60% of participants reported reading other news outlets reporting crimes, news articles, or flyers published by their institutions. However, only 27% of respondents attended crime awareness programs required by the Clery Act. Participants from smaller and private institutions were significantly more likely to report receiving the reports. It is most likely that smaller institutions have better communication systems, lower crime rates, and are more likely to use that information for recruitment and public relations purposes (Nicklin, 2001). About 89% of respondents reported feeling very safe on their college campuses. Another 75% reported feeling very safe off-campus, and just 15% of respondents have been crime victims. These results correspond with other studies indicating that crimes on college campuses are much lower than in the community (Janosik & Gehring, 2003).

In the study on parents' views on the Clery Act and campus safety, 435 parents participated in the single-institution study that examined their use of the information in the Federal mandate specified in the Clery Act (Janosik, 2004). A 24-item questionnaire evaluated if parents are aware of the Clery campus Crime Act, how parents use the campus crime information, what parents think about the strategies college administrators use to inform students about campus crime issues, and parents' perceptions about the disclosure of campus crimes. Twenty-one questions check parents' knowledge about the Clery Act and if parents have used the information provided by the mandatory reports. All respondents were parents of first-year college students, with 236 parents (54%)

sending students to college for the first time and 199 respondents (45%) reporting having other students in college. Thirty-seven respondents (8.5%) reported having some high school experience, and 91.5% said they had attended or graduated from college. Approximately 99.8% of respondents indicated that their students would be safe or very safe on the college campus. In comparison, 98.4% indicated that their students would be very safe in the environment adjacent to the campus (Janosik, 2004).

Despite the efforts to create awareness about the Clery Act, only about one-quarter of parents participating in the study knew about the Clery Act and read the campus crime summary included in the admission package. Only 15% of parents read the Annual Security Reports before attending the summer orientation with their students, and just 6% considered using the information for college decision choices. Information about campus crime played almost no role in decisions about college choice; factors such as academic reputation, cost, the beauty of the campus, and other factors were the primary considerations in the decision-making process (Janosik, 2004). Even though parents talk to their children about campus safety before dropping them off at college, the study suggests that parents do not use information in the mandatory data from the Clery Act in their conversations. Most parents believed the campus environment was safe but wondered if the campus administration would provide an accurate picture of campus crimes. One of the main goals of the Clery Act was to provide information so that prospective students, employees, and parents could consider the information before deciding on a college. The study concluded that the Clery Act has been ineffective as the specific group targeted by the mandate does not read or use the information (Janosik, 2004).

Another goal of the Clery Act was to make campus crime statistics available to the public so that college students could take proactive measures to protect themselves and their properties. As students are more conscious of data on campus crime, it promotes campus security and helps to reduce crime on college campuses (Gregory & Janosik, 2006). The implementation of the Clery Act was examined based on its impact on students' behavior to determine the extent to which students have been taking proper actions to protect themselves and their properties.

Compliance with the Clery Act

Compliance with the Clery Act is an essential duty of Clery compliance officers and security administrators within higher education institutions. The study by Gregory, Giblin, Stafford, and DeBowes (2016) assessed Clery compliance officers to see whether they complied with the Clery reporting requirements and identified needed changes to make them more effective. The participants were institutional members of the International Association of Campus Law Enforcement Administrators (IACLEA) and individual members of the IACLEA. The study was conducted by analyzing data from a survey comprising 30 questions. The online survey went to a total of 1350 individuals. About a quarter of all institutions have indicated that they did not have a person identified as the Clery Compliance Officer (CCO), either full-time or part-time. As a result, higher education institutions are prone to errors or omissions of Clery Act requirements without a designated individual for Clery Act compliance. The study noted that 91% of respondents indicated that their Clery compliance duties are secondary and that they perform the tasks as "other duties as assigned" in their job description, with most CCOs working only part-time. Most respondents reported that the Director served as the Clery

compliance officer. It may be highly challenging to manage the daily supervision of the police, public safety staff, operations, emergency management, fire safety, Title IX, and comply with all the requirements of the Clery Act. The results show a need for more focus on the critical and increasing task of the Clery Act. The lack of focus on Clery compliance contributes to why most institutions audited by the Department of Education need to comply with the Clery Act (Gregory et al., 2016).

About 17.8% of participants indicated that they gathered their statistics for the ASR from an automated report writing system or focused only on the 12 Clery Crime categories. Higher education institutions that rely on specific types of computerized systems may miss reportable crimes because most automated systems record crimes under state crime code classifications and must be translated to the UCR classification for Clery Act purposes. Twenty percent of respondents reported that they did not have an audit trail used in the case of the Department of Education investigation. An audit trail may cause significant difficulties for institutions as there will be no means of substantiating their reported statistics, resulting in fines. Some institutions indicate that they use their daily crime log as an audit trail, which may create problems as most daily crime logs record using the state criminal code definitions, not UCR definitions (Gregory et al., 2016). Since the Clery Act definitions are usually different from state statutory criminal definitions, there is often misclassification in areas such as burglary, sex offenses, domestic violence, dating violence, stalking, hate crimes, and arson (Webster & Healy, 2016).

Some respondents reported that campus officials verbally requested crime reports from police agencies. Gregory et al. (2016) indicated that the inability of the institutions

to document crimes puts them out of compliance with the Clery Act and prone to violations. Even institutions that request statistics in writing may not comply, as 20 to 40 percent of institutions indicated that not all needed data are requested. If crime statistics from the local police are accurate, the institution will comply with the law. However, if the request is inaccurate, the institution will be considered not in compliance with the law. The study results show that some institutions still need to include all the requirements in the request for statistics from local police. Approximately 21 percent of participants said arrests for drugs, liquor, and weapon offenses were not in their request. Thirty-nine percent said the specific addresses for on-campus property for reporting purposes were not in their request.

In comparison, 34 percent of respondents indicated that the specific addresses of non-campus properties in their jurisdiction were not requested. On a positive note, about 90 percent of the institutions represented identified that they receive data from local law enforcement agencies that are not legally required to provide the data. However, about 12 percent do not request statistics from local law enforcement, and 3 percent receive data verbally and need an audit trail. In the case of the Department of Education audit, all of these could result in an institution being out of compliance (Gregory et al., 2016).

Most participants indicated that they receive data from the campus student conduct officials annually, which may result in sorting large amounts of data, which may be a problem on many campuses. About 6.2 percent of participants indicated that they received data verbally with no audit trail. DeBowes (2014) cautioned against relying on statistics from student conduct officials as it is highly probable that they are inaccurately recording crimes from their case files. The study suggested that statistics from

participants show that institutions need to conduct the required test of emergency

response on an annual basis. More than 15 percent of respondents indicated that they had

no exercise in 2011, the last year the data for the statistics was collected.

Conceptual Framework

There was a need to use a conceptual framework to analyze how higher education

institutions are implementing changes to the Clery Act guidelines. Therefore,

implementing the new Clery Act guidelines was examined using the Normalization

Process Theory.

Normalization Process Theory

The Normalization Process Theory examined how administrators implement the

new Clery Act guidelines. It provided a means to describe and understand social

processes using new or changed practices of approaching and organizing work (May &

Finch, 2009). This theory was initially used in healthcare but is now widely used in

academics and other disciplines. It identifies and describes procedures empirically

demonstrated to influence and affect implementation processes and outcomes (McEvoy,

Ballini, Maltoni, O'Donnell, Mair & MacFarlane, 2014). The Normalization Process

Theory is a theory of implementation that encourages considering issues around practices

in a social organization (implementation), establishing practices in routine (embedding),

and sustaining practices in an organization (integration) (May & Finch, 2009). The theory

proposes that material methods become routine as people work individually and

collectively to implement the practices within a social context. According to May and

Finch (2009), the implementation process involves the organization of individuals

interacting within a specific context over a given period, focusing on what people do and how they work. The Normalization Process Theory proposes four components that are involved in the implementation of a practice. Figure 1 shows the four components: coherence, cognitive participation, collective action, and reflexive monitoring. Coherence is the sense-making to understand tasks to promote a practice. Cognitive participation involves the enrollment of individuals to implement a new method. Collective action entails modifying procedures to achieve a common goal, and reflexive monitoring is appraising a new process and its effect on practice.

Figure 1

Components of Normalization Process Theory

Coherence	Cognitive Participation
Sense-making to understand tasks to promote a practice	Enrollment of individuals to implement a new practice
Collective Action	**Reflexive Monitoring**
Modifying procedures to achieve a common goal.	Appraising a new process and its effect on practice.

Normalization Process Theory identifies factors that can promote or inhibit the implementation of a practice using the four components identified in Figure 1. (May & Finch, 2009; May, Rapley, Mair, Treweek, Murray, Ballini, & Finch, 2015). The four

components; coherence, cognitive participation, collective action, and reflexive monitoring are explained in detail below;

Coherence

This first stage of the theory proposes that establishing a new set of practices depends on work that defines and organizes the practice. Coherence is a practice that organizes actions based on the meaning, uses, and social definitions of those who enact the practice. Coherence is the planning stage where institutions must understand and make sense of how to implement a policy. Higher Education Institutions have relied on the Clery Act handbook guidance since 2005 but must determine appropriate steps to adapt to the new guidelines in the Appendix (Kent, 2020). The sense-making process involves understanding what organizations must do to promote a practice (Finch, Mair, O'Donnell, Murray, & May 2012). With the new Clery Act guidelines, higher education institutions must make sense of the new policy. It depends on how individuals comprehend and makes sense of their work (McEvoy, Ballini, Maltoni, O'Donnell, Mair, & MacFarlane, 2014). Administrators have to plan their approach to implement the new Clery Act guidelines based on the meaning of the change. This process depends on the extent of meaning made by participants (Finch et al., 2012). Embedding the work is influenced by factors that promote or inhibit participants' understanding of the practice as meaningful (May & Finch, 2009). Coherence uses four mechanisms: Differentiation, communal specification, individual specification, and internalization. Table 1 gives a visual representation of the four mechanisms of coherence in relation to the implementation of the new Clery Act guidelines.

Table 1

Coherence – Planning Stage, Making Sense of it

Mechanism	Description	Area to explore
Differentiation	Sense-making requires understanding how a set of practices differ from each other.	How the new Clery Act guidelines differ from previous guidelines.
Communal specification	Sense-making depends on individuals working together to build shared understanding of objectives.	How administrators ensure a shared understanding of Clery Act guidelines.
Individual specification	Sense-making requires individuals to do what will help them understand specific tasks for a set of practices.	How Clery officials describe their role in implementing the new guidelines.
Internalization	Sense-making expects people to know the value of a set of practices.	Is there added value to of campus crime reporting in the new Clery guidelines?

(May et al., 2015).

The first mechanism of coherence is differentiation. Sense-making requires understanding how practices differ (May et al., 2015). This section will examine how administrators make sense of the new Clery Act guidelines as it differs from previous guidelines. The communal specification of sense-making depends on individuals working together to build a shared understanding of objectives (May et al., 2015). This section will evaluate how administrators ensure a shared understanding of the Clery Act guidelines. Individual specification is sense-making that requires individuals to do what

will help them understand specific tasks for a set of practices (May et al., 2015). There

will be a focus on how Clery Act officials describe their role in implementing the new

guidelines. Internalization is sense-making that expects people to know the value of a set

of practices (May et al., 2015). The last segment of this section will examine if there is an

added value to campus crime reporting from the new Clery Act guidelines.

Cognitive Participation

The cognitive participation mechanism requires purposive interaction chains that

comprise an implementation process. First, embedding entails work that defines and

organizes participants in a practice (May & Finch, 2009). Second, cognitive participation

is the stage where institutions work out participation to implement a new method. For

example, administrators must engage individuals to implement the new Clery Act

guidelines. This process entails institutions enrolling participants to practice the new

policy (Finch et al., 2012). Second, it involves building a solid motivation to seek the

buy-in and cooperation needed to effect meaningful change (Hussain et al., 2016). This

section applies human engagement with long interaction chains. Third, it requires the

commitment of participants organized through socially patterned cognitive participation.

Finally, embedding involves work influenced by factors that promote or inhibit individual

participation (May & Finch, 2009). Cognitive participation is explained using four

mechanisms: Initiation, legitimation, enrolment, and activation. Table 2 gives a visual

representation of the four mechanisms of cognitive participation in relation to the

implementation of the new Clery Act guidelines.

Table 2

Cognitive Participation – Enrollment and Engagement of Individuals and Groups

Mechanism	Description	Area to explore
Initiation	Participants need to work to support new or modified set of practices.	Do participants have the right skills to implement the New Clery Act guidelines?
Legitimation	Participants have to believe in their involvement to make a valid contribution.	How are participants engaged and organize in carrying out the new Clery guidelines?
Enrolment	Participants have to organize themselves to ensure collaborative contribution.	How various departments collaborate with others to implement the Clery Act guidelines.
Activation	Participants have to collaborate to identify process required to sustain a practice.	What actions are required to ensure compliance with the new guidelines?

. (May et al., 2015).

The first mechanism of cognitive participation is initiation. It involves participants' need to work to support a new or modified set of practices (May et al., 2015). This section will examine if participants have the right skills to implement the new Clery Act guidelines. Legitimation describes that participants have to believe in their involvement to make a valid contribution to a practice (May et al., 2015). This section will examine how participants are engaged and organized in implementing the new Clery Act guidelines. Enrolment involves participants organizing themselves to ensure collaborative contribution to a set of practices (May et al., 2015). There will be an

analysis of how various departments collaborate with others to implement the Clery Act guidelines. The last segment of cognitive participation is activation, which states that participants must collaborate to identify the process required to sustain a practice (May et al., 2015). It will examine necessary actions to ensure compliance with the new Clery Act guidelines.

Collective Action

Collective action is the series of interactions for tracing the cognitive participation of individuals. It involves understanding the mental and material work of organizing and enacting a practice (May & Finch, 2009). This segment's work involves reshaping behavior or actions with a collective purposive action to achieve a common goal. Clery Act administrators must determine areas, policies, and procedures that need to change to conform with the new Clery Act requirements. Under the new guidelines, institutions must change how they determine campus crimes to report, individuals designated as mandatory reporters of crimes, and areas to collect crime data. Collective action is the stage where institutions have to carry out the new practice with the support of the participants (Finch et al., 2012). Working towards a common goal in this section may include resistance or reinvention to ensure compliance, but it always involves making an effort around the practice (May & Finch, 2009). Implementing the change entails moving the institution from the organization's current state into a new stage to create new structures (Kezar, 2001). Embedding work is influenced by factors that promote or inhibit participants' enacting it (May & Finch, 2009). Collective action was explained using Interactional workability, relational integration, contextual integration, and set skill

workability. Table 3 gives a visual representation of the four mechanisms of cognitive

participation in relation to the implementation of the new Clery Act guidelines.

Table 3

Collective Action – Interaction with Existing Practices

Mechanism	Description	Area to explore
Interactional Workability	Work that people do with each other and other sets of practices in everyday setting.	How do administrators work together to implement the new Clery guidelines?
Relational Integration	Work that people do to build accountability and maintain confidence in a set of practices in each other as they use them.	How to do individual work with and trust the work of others?
Contextual Integration	Work managing a set of practices through the allocation of resources and execute policies and procedures.	How are resources allocated with the new campus crime reporting?
Skill Set Workability	Work that establishes the division of labor built around the execution of a set of practices.	How are tasks divided for the collation of the Annual Security Report required by the Clery Act.

(May et al., 2015).

The first mechanism of collective action is interactional workability. It describes

work that people do with each other and other sets of practices in an everyday setting

(May et al., 2015). This section will explore how administrators work together to

implement the new Clery Act guidelines. Relational integration involves work that people

do to build accountability and maintain confidence in a set of practices in each other as they use them (May et al., 2015). How participants work with others and trust the work of others will be evaluated. The third component of contextual integration involves managing practices by allocating resources and executing policies and procedures (May & Finch, 2009). This section will investigate the allocation of resources with the new campus crime reporting. Finally, Skillset workability establishes the division of labor built around executing a set of practices (May & Finch, 2009). The procedures involved in how tasks are divided for collecting and collating

Reflexive Monitoring

Participants in the implementation process constantly analyze the method of collective actions and their outcomes. This monitoring is done formally and informally to reflect the nature of cognitive participation and collection action (May & Finch, 2009). Reflexive monitoring is the appraisal stage where there is an assessment of the new practice and its effect on practice. The advantages and disadvantages of the new process were examined to assess its strengths and weaknesses (Finch et al., 2012). Monitoring work patterns is based on the normative elements of implementation. It focuses on how things should be instead of how things work out in practice. How things are done depends on work that defines and organizes the understanding of the practice. Embedding work is shaped by factors that promote or inhibit appraisal (May & Finch, 2009). Reflective monitoring was explained using systematization, individual appraisal, communal appraisal, and reconfiguration. Table 4 gives a visual representation of the four mechanisms of reflective monitoring in relation to the implementation of the new Clery Act guidelines.

Table 4

Reflexive Monitoring – How Practice is Understood and Assessed by Actors

Mechanism	Description	Area to explore
Systematization	Involves collecting information in various ways.	How do institutions collate campus crime statistics?
Individual Appraisal	Participants evaluate the effect of a new set of practices on them.	How do administrators evaluate practices from their experiences?
Communal Appraisal	Formal collaboration of individuals to analyze merits of their practices.	How do administrators work with others to evaluate if procedures are effective?
Reconfiguration	Appraisal to redefine procedures, modify practices or change ways of doing things.	How do administrators make changes to procedures inline with the new Clery Act guidelines?

(May et al., 2015).

The first mechanism of reflective monitoring is systematization, which involves collecting information using various methods (May et al., 2015). This section will explore how administrators collate campus crime statistics. Individual appraisal has to do with how participants evaluate the effect of a new set of practices on them (May et al., 2015). An investigation of how administrators assess their practices from their experiences will be made. Communal appraisal involves a formal collaboration of individuals to analyze the set merits of their practices (May et al., 2015). How administrators work with others to evaluate effective procedures will be considered.

Higher education institutions should constantly seek new and more efficient ways to address campus safety, and they are prone to adopt new policies, procedures, and practices. The last mechanism of reflective monitoring is reconfiguration, which is an appraisal to redefine procedures, modify practices, or change ways of doing things (May et al., 2015). This segment will examine how administrators make changes to their operations in line with the new Clery Act guidelines. When an institution has made changes and adopted the new ways of working, then the institution will identify what supports the changes made to Clery Act reporting procedures, identify barriers to sustaining modifications made, and develop ways to maintain the change.

Summary

This chapter gives an overview of campus crime that dates back to the beginning of higher education in America and examines the history of the Clery Act, established as a result of the violent death of Jeanne Clery in her dormitory. Crime reporting before the Clery Act was discussed when very little information concerning campus crime was available (Fisher et al., 2002). It argues that even though the Clery Act requirements seem reasonable and attainable, its sole reliance on crime statistics makes it prone to non-compliance and presents significant challenges that are unlikely to be tackled successfully by higher education institutions (Sloan & Fisher, 2011). They argue that the Clery Act was enacted like crime reporting under the Uniform Crime Reports (UCR). As a result, it has been flawed for systematically under-reporting crimes because it omits the number of crime victims who do not report the incident to law enforcement officers. A criticism of the Clery Act is that it ignores the research that its official statistics are based on the core idea of the UCR. The UCR is systematically under-reporting crime

victimizations because it does not include many victims who did not report their experiences to law enforcement officials (Fisher et al., 2002).

This study explored the various Clery Act requirements that higher education institutions must comply with, but there have been several changes to the Clery Act guidelines. The Normalization Process Theory examined how administrators implement the new Clery Act guidelines. It is a theory that describes the implementation process with a focus on issues around practices in a social organization (implementation), establishing practices in routine (embedding), and sustaining practices in an organization (integration) (May & Finch, 2009). The theory suggests that practices become routine as people work individually and collectively to implement the procedures within a social context. The approach proposed examining implementation through coherence, cognitive participation, collective action, and reflexive monitoring. The coherence and cognitive participation stages are the planning stages where administrators make sense of the theory and work out participation to implement the practice. Collective action is the stage where participants enact the new method, and reflexive monitoring involves evaluating and evaluating the procedure to determine its effectiveness (Finch et al., 2012). These stages were used to assess the implementation of the Clery Act guidelines in campus crime reporting.

Chapter 3

Methodology

National attention has been drawn to crime on college campuses as the traditional role of colleges as a haven for students is challenged because of the highly publicized trials of campus crimes amid allegations that higher education institutions mishandled reports that should have protected students (Nobles et al., 2013). Campus crime was brought to the limelight by the enactment of the Clery Act after the death of Jeanne Clery in her college dorm. An investigation discovered that thirty-eight violent crimes had occurred on the campus for three years before Jeanne's death, and the information was withheld from the public (Sloan & Fisher,1995). As a result, the Clerys began a national campaign for campus security laws. They lobbied for policy changes, resulting in the Student Right to Know and Campus Security Act, which was later renamed the Clery Act (Clery, 2020). The Clery Act requires all colleges and universities participating in federal financial aid programs to keep and disclose information about crimes on and around their campus community for the preceding three years. The goal of the Clery Act was to ensure higher education institutions take action to protect students and promote a safe learning environment (Sloan et al., 1997). After 30 years of the Clery Act, several changes have occurred, with an increasing number of lawsuits, violations, and penalties indicating that institutions are not accurately publishing crime statistics and taking measures to prevent and respond to campus violence (McNeal, 2007).

This study examined how campus security officers implement the new Clery Act guidelines in crime reporting. The recent withdrawal of the Clery Act handbook requires

higher education institutions to break down the existing ways of gathering campus crime data and develop new processes. (Carter,2020). It investigated the procedures in response to the new Clery Act guidelines and the impact of eliminating campus crime definitions on reporting the Clery Act. The Department of Education will accept a reasonable interpretation of terms by higher education institutions as long as the crimes are defined in the Clery Act report (Carter, 2020). The new regulation no longer applies specific, measurable distance to determine geographical areas to include in the Clery Act report (Armentrout et al., 2020). Institutions must determine and justify crime statistics for locations reported in the Clery Act. The recent changes by the Department of Education expect higher education institutions to use reasonable interpretations to determine geographical areas like public property, non-campus buildings, and off-campus locations included in the Clery Act reports (Carter, 2020).

The new Clery Act guidelines became effective on January 1, 2021, and very little is known about how the changes to the Clery Act guidelines have affected campus crime reporting. However, this study intends to provide insights into how the recent changes affect Clery Act reporting. Institutions must strategize to prevent crimes in the campus community while keeping up with the requirements of the Clery Act. Campus security must set up a process for security and incident reporting. Higher education institutions must implement changes to the new Clery Act guidelines. There needs to be more information about how the changes to the Clery Act guidelines have affected campus crime reporting. However, this study provides insights into how the recent changes affect Clery Act reporting.

Research Questions

The research questions provided an in-depth analysis of the implementation of the new Clery Act. Cousin (2005) identified that research questions are the main points that guide the extent of the study. The following research questions align with the study's purpose and the researcher's goals.

1. How do campus security officers implement the new Clery Act guidelines in crime reporting?

2. What are the reporting procedures in response to the new Clery Act guidelines?

3. What strategies do higher education institutions use to evaluate the implementation of the Clery Act guidelines?

Research Design

My study was based on implementing the new Clery Act guidelines, and a qualitative research design was necessary to gain an in-depth understanding of the subject. According to Rossman and Rallis (2017), qualitative research helps to understand a phenomenon thoroughly. Qualitative research was an appropriate approach for my study because of the opportunity to dig deeper to understand the implementation process of the Clery Act guidelines and how it has affected campus crime reporting in higher education institutions. It is an effort to understand circumstances within a particular context with an analysis that seeks an in-depth understanding (Creswell & Creswell, 2018). Qualitative research was a perfect fit for my study because it helped me understand through verbal and non-verbal communication, get clarifications of

information, and confirm the participants' responses for interpretation accuracy (Rossman & Rallis, (2017). The final product of qualitative inquiry is mainly descriptive, using words and pictures rather than numbers to convey the study's findings (Maxwell, 2013).

The descriptive nature of qualitative research aided my comprehension of the subject. Campus security officers must make sense of the new guidelines by planning and identifying procedures to change in gathering information and compiling campus crime data. Qualitative research helped to collect richer information from the participants' opinions, experience, and knowledge about how changes to the Clery Act have influenced their institution (Creswell, 2013). It made it easier to organize my collected data by establishing patterns, creating themes, and arranging themes in categories. It helped to identify strategies used by itemizing points and placing them into categories. This form of research provides an in-depth clarification of a phenomenon through data collection, analysis, and interpretation (Creswell & Creswell, 2018). The qualitative research method helped me to generate and analyze empirical material by making distinctions and providing an improved understanding of the subject (Aspers & Corte, 2019). According to Becker (2017), understanding the research outcome is based on the connection of the data, concepts, pieces of evidence, and application of the findings. The research method granted access to valuable information about implementing the recent changes to the Clery Act guidelines on higher institutions.

Strategy of Inquiry

My study used a case study to evaluate the implementation of the Clery Act guidelines in campus crime reporting. A case study qualitative design was appropriate for

my research because it is descriptive and describes the phenomenon under investigation. It thoroughly explains and examines a bounded system within a phenomenon. It was designed to capture an investigation of a single case and evaluate a phenomenon within a social context, especially when the boundaries between the object of study and context are unclear (Ebneyamini, Reza & Moghadam, 2018).

Merriam (2009) described three features of case study research. First, it represents a case study as particularistic, meaning that a case study is based on a particular happening, situation, or phenomenon. Secondly, a case study was described as descriptive, which gives a detailed presentation of the phenomenon under consideration. The last distinguishing factor of a case study is that it is heuristic, which helps to boost understanding of the study under consideration and brings about the discovery of new meaning (Merriam, 2009). Yin (2003) identified that case studies would boost the reader's understanding of the phenomenon that is studied. It gave new meaning to the subject under consideration, extended the reader's experience, and confirmed what was known.

Research Location

This qualitative study took place at a four-year university in the North East. EOA University is a Carnegie-classified national doctoral research institution. The institution has developed into a comprehensive research university ranked by U.S. News & World Report among the nation's best national public research universities. The institution has a student population of approximately 19,678 undergraduates and graduate students. About 33 percent of the students are under-represented, and 250 international students are from

40 countries. The institution offers 90 bachelor's and 48 master's degree programs and two professional and eight doctoral programs from eight colleges and five schools. More than 200 study abroad programs in 40 countries and 1,714 faculty with several campuses throughout the state and online.

The study investigated the implementation of the new Clery Act guidelines at EOA University and its various campus locations so that the institution can identify areas of improvement and similar institutions can emulate effective strategies. The higher education institution offers a comprehensive public safety program for the university community with various services like campus police, security, dispatch Center, Crime Prevention, and the Office of Emergency Management. It has a designated Department for Public Safety that focuses on preventive patrols and crime prevention programming throughout its college campuses. The Commission accredits the Department of Accreditation of Law Enforcement Agencies (CALEA) and the International Association of Campus Law Enforcement Administrators (IACLEA). The department is the first University in the state to receive the prestigious CALEA recognition and one of 50 nationwide.

Sampling Method

Merriam (2002) identified that since the goal of qualitative research is to understand the meaning of a phenomenon from the participant's perspective, selecting a sample that will provide the most valuable information is essential. This study utilized a purposeful sampling method. According to Patton (1990), it is vital to use purposeful sampling to get information-rich cases for in-depth analysis. An information-rich study

provides critical information central to the research's purpose. Participants for this study were identified based on their shared responsibilities in implementing the Clery guidelines at the institution. The participants were selected through purposive sampling as the approach seeks a group that will provide significant contributions and closely fit the research questions (Smith & Osborn, 2008). The sampling method was purposeful as participants work in the institution's public safety and Clery Act compliance department. Smith and Osborn (2008) emphasize avoiding a sample size that is too large and can become overwhelming by the volume of data generated by a qualitative study that may not produce a penetrating analysis. I sent an email to all participants identified, stating the study's objective and the need to obtain each participant's perspective to contribute to the literature on the impact of changes to the Clery Act guidelines and an evaluation of the change process involved.

Research Participants

The participants for this study play various roles in implementing the changes to the Clery Act guidelines at EOA University. Some work to meet the requirements of the Clery Act daily, while others ensure that the annual requirements are met. The individuals invited as participants work directly with collecting, reporting, and collating campus crime statistics. The selection of participants was based on the experiences and roles of those working directly with meeting the requirements of the Clery Act. An invitation for participation was sent to the Director for Clery compliance at EOA University. Other participants were selected from the University's Clery compliance office and the public safety records office. The role of participants includes those involved in compiling the Annual Security Report and publishing policy statements at the

institution. In addition, the participants in the study have a shared responsibility for working to ensure that their campus crime statistics are submitted to the Department of Education by the October 1 deadline. All higher education institutions must designate individuals as CSAs who must provide information on any crimes reported to them to public safety (Department of Education, 2016). Several institutions have full-time employees designated as Clery compliance officers whose sole responsibility is to ensure the proper reporting of all incidents. This study had 10 participants from individuals designated as CSA and campus security officers whose responsibility entails ensuring compliance with the Clery Act and promoting campus safety.

Data Collection

This study collected data using various sources to provide the best information to answer the research questions. According to Baxter and Jack (2008), the distinctive feature of case study research is using various data sources. Data was collected using interviews, document analysis, and follow-up interviews. Usually, there is a primary source of data with support from other methods of data (Gill, Stewart, Treasure, & Chadwich, 2008). Researchers are encouraged to use more than one source of data as the various data sources will enhance the validity of the findings (Merriam, 2002). A case study uses multiple data sources in the analysis process instead of handling each source separately. Each source of data contributed to understanding the subject under consideration (Sutton & Austin, 2015). The merging of the various sources of data strengthened the findings to promote a greater understanding of the phenomenon (Baxter & Jack, 2008). I conducted interviews, analyzed documents, and had follow-up interviews with some participants to get information to answer the research questions.

Interviews

Data for my study was collected by conducting interviews. In qualitative research, there are highly structured interviews where specific questions are prepared before the interview. On the other hand, there are unstructured interviews where questions and topics are determined during the interview (Merriam, 2002). Most interviews fall between structured and unstructured interviews, known as semi-structured interviews. I conducted semi-structured interviews to gather data for this study. The semi-structured interviews entail being guided by the set of interview questions instead of controlled by them. Although I had specific areas of interest with questions to pursue, I wanted to dig deeper with follow-up questions and leads from the discussions (Smith & Osborn, 2008). Semi-structured interviews are a mixture of questions desiring specific information from participants forming the structured section of the interview and a list of questions to discuss where the order or wordings of the question had yet to be determined before the interview (Merriam, 2002).

In my study, the participants determined the interview's direction. Suppose the participant brings up a point, the researcher will press further with questions to allow maximum opportunity for participants to share their experiences (Smith & Osborn, 2008). A semi-structured interview helped to establish rapport with participants and provide flexibility; the chance to plunge into new areas will produce more excellent quality data. Data from the semi-structured interviews were collected conveniently for each participant. The interview location was important as participants felt more comfortable in a familiar place (Smith & Osborn, 2008). Each interview was scheduled for one hour because semi-structured interviews usually take a long time as they could be

engaging depending on the topic. I got informed consent from participants and consented to record the audio. The entire interview was recorded using a voice recorder. The interviews were conducted in person and on Zoom. The interviews were transcribed, and all the spoken words, false starts, significant pauses, and laughs were indicated in the transcript (Smith & Osborn, 2008).

Document Analysis

In addition to the data from the interviews, the second data source for this study was the analysis of documents. I analyzed the Annual Security Report (ASR) for EOA University from 2020 – 2022, and I was able to compare how the campus security officers reported the Clery Act statistics to the Department of Education before and after the new guidelines. The 2022 ASR published after the new Clery Act guidelines gives a more detailed description of the reporting procedures at EOA University. It includes additional procedures for reporting criminal activity and emergencies and updates the individuals designated as Campus Security Authority CSAs. For example, before the new policy, the ASR had a broader range of individuals designated as CSAs. However, the 2022 ASR limits CSAs to those with significant responsibilities over student affairs by sspecifyingDeans, Advisors, Department heads, Chairs, and Directors. The strength of documents as a source of data lies in their presence in the environment, their not altering the setting in any way, and their not being dependent on the opinion of anyone, as in interviews and during observations (Merriam, 2002). I confirmed the changes made in the Annual Security Report in response to the new Clery Act guidelines. Relevant public records and documents were collected and analyzed using descriptions and richly detailed narratives.

Information was gathered using the daily crime logs, daily fire logs posted by the institution, and the Clery Act cover sheets at the records office. I reviewed the daily crime and fire logs for November 2022 to February 2023. The logs record incidents reported to Public Safety within two business days of receiving the report. The logs record the type of incident, the date the incident was reported, the time and date, and the location. The Department of Education requires campus security officers to maintain the daily crime log available to the campus community. I saw that the daily incident records do not identify the victims but provide awareness to the campus community. I examined the Clery Act cover sheets that the University records office uses in addition to the digital spreadsheet. The sheets had been redesigned to confirm the new classification of Clery crimes as specified by the guidelines. I looked through the Clery incident binders used to file the Clery Act sheets at the university records office, as records of Clery crimes are never destroyed. I looked through the records in the spreadsheet used to record all incidents reported to public safety.

Follow-Up Interviews

I had follow-up interviews with some participants to allow reflections on discussions from the first interview and gain further insights (Holter, Ness, Johansen, & Brendryen, 2019). During the follow-up interview, a summary of discussions from the first interview was made with specific questions. The follow–up interview referred to the first interview for clarification and a better understanding of the points. It reflected on the discussions from the first interview and allowed the discovery of new insights. For example, during the second interview, the participants were able to give more details about the online recording system used at EOA University. As a result, I received

clarification on whether it was the same as the online recording system used by CSAs to submit incidents to public safety. In addition, it enabled me to clarify questions and get in-depth interpretations of previous discussions from the participants.

Data Analysis

Data analysis aims to find critical themes or patterns that add new perspectives to a phenomenon—examining information gathered to extract unique insight to add to current research (Rossman & Rallis, 2017). In this study, data analysis was conducted simultaneously with data collection since there is no standard method for reporting data. Data analysis began immediately after the first interview and after access to documents. Simultaneous data collection and analysis enable revisions during the research. In addition, it allows for the redirection of data collection and testing emerging concepts and themes with future data. Waiting to collect all data before analysis will prevent the opportunity to gather more reliable and valid data (Merriam, 2002). Smith, Flower, and Larkin (2009) indicated that qualitative research has a variety of methods to interpret data. Framework analysis is an increasingly used approach to analyze qualitative data, which gives distinct steps to follow and produces structured outputs in summarized data (Gale, Heath, Cameron, Rashid & Redwood, 2013). The procedure for analysis using the framework methods involves five main steps: familiarization with the interview, developing a thematic framework and coding, indexing, charting, mapping, and interpretation.

Familiarization with the Data

According to Ritchie & Spencer (1994), familiarization is the stage where the researcher becomes acquainted with the data transcripts to get an overview of the data collected. from the interviews, document analysis, and journal writings. The first step in the framework analysis involves becoming familiar with the interview using the researcher's transcripts, audio recordings, or reflective notes (Gale et al., 2013). At this stage, I listened to recordings of the interviews, transcribed the audio, read the transcripts, and scrutinized the data to identify themes, patterns, and ideas that stood out. During the process, I identified the main ideas and recurrent themes. Familiarization is helpful when others assist the researcher in collecting or transcribing data. If the amount of data is modest, then the researcher might review all the data, but if the data are extensive, then the researcher might check a subset of the data (Gale et al., 2013). I reviewed the participants' data and identified similarities and differences between the participants' contributions.

Developing Themes and Coding

After familiarization, I carefully read the transcripts to generate themes, concepts, and ideas. The review was done line by line using paraphrases or codes that describe the sentence (Gale et al., 2013). Next, the various data sources were coded by extracting and compiling information meaningfully. Data collected in this study were coded in two cycles using process and pattern coding. A code in qualitative research is usually a word or short phrase that summarizes a sentence. The first cycle of coding was done using process coding. Process coding refers to coding that gives meaning to action words using

"ing" to describe a word or phrase (Saldaña, 2016). The data coded in the first cycle of

the coding process range from a single word to complete sentences to a whole page of

text. The process coding was appropriate for this study because it provided insight into

organizational factors from the transcript and helped to analyze the corporate strategies

and the impact of organizational dissonance in reporting campus crimes.

The second coding cycle was done using pattern coding. It entails coding longer

passages of text and reconfiguring codes that have been developed (Saldaña, 2016).

Under pattern coding, data were classified into various segments, and a systematic

approach will help determine emerging themes and analyze data. The pattern coding

method was used to compress the data collected, identify emerging themes, and classify

to provide information from the data (Saldaña, 2016). According to Maxwell (2013), a

significant purpose of coding is to reduce data by reorganizing them into different

categories and assist in developing appropriate concepts for analysis. An example of the

coding and thematic table used in this study can be found in Figure 2 below;

Figure 2

Coding and Thematic Table

1st Cycle Coding	2nd Cycle Coding	Themes
Reviewing	Examining something	Conceptualizing the
Investigating	Thorough Inquiry	guidelines
Complying	Meeting the specific standard	
Reporting	Giving account	Clery reporting
Recording	Documenting information	process

1st Cycle Coding	2nd Cycle Coding	Themes
Evaluation	Assessing information	

Indexing

The indexing process entails identifying sections of the data that correspond to a theme, and this practice was applied to the textual data collected in the study (Ritchie & Spencer, 1994). At this stage, I read the data and assign each theme to the data. The data uses a transcript of an interview and assigns each response, sentence, and feedback to a theme (Srivastava & Thomson, 2009). The themes are specified in the margins and comments in Microsoft Word. The researcher explores the whole data rather than a section and can choose a range of varieties. When two themes apply to the exact text, the themes are combined, and the relationship between both themes is discussed. The interpretation of the text was based on the researcher's understanding of the text and themes.

Charting

Ritchie and Spencer (1994) describe charting as moving original texts and placing them into charts consisting of the titles and subtitles generated during the thematic stage. Qualitative data involves lots of data; summarizing data is essential in data analysis. Charting involves compressing data by translating the data into categories. For example, the frequency of certain words was identified from the interviews. I used a chart to

identify themes by counting the number of times the participants mentioned a subject,

which helped to give a visual representation of the data. Figure 3 below uses the themes

identified under indexing to identify the number of times the participants mentioned the

themes. The themes were represented by the numbers 1 to 5 to compress the data and

help analyze it.

Figure 3

Data Charting

Section of Transcript	Section of Transcript	Coding
1. Use of electronic records	We use a new online system	1
	Incidents are reported electronically	1
	CSAs use the Maxient Reporting System	1, 3
2. Identifying Clery crimes	I review online records to identify Clery reportable crimes	1, 2
	I check to see if it falls under the Clery crimes	2
3. Campus Security Authority's obligation to report	CSAs have an obligation to report crimes	3
	They are obligated to make a report online	1, 3
	We have to report crimes to Public Safety	3
4. Conducting Clery training	We do a lot of training	4
	So we have periodic training	4

Section of Transcript	Section of Transcript	Coding
	We have been trained to identify cases of sexual assaults	2, 4
5. Periodic audits for compliance	We conduct periodic audits of procedures and practices	5
	Internal audits check to ensure all Clery incidents have been reported	2, 5

Mapping and Interpretation

Data mapping helps to understand how the ideas are connected from the data

sources (Gale et al., 2013). I drew a map during the analysis to help interpret data. It

helped me to establish a connection between the themes extracted from the transcript.

Figure 4 below shows an example of a map used to connect the data from the

participants.

Positionality

My role in this study was to evaluate the implementation of changes to the Clery

Act guidelines on higher education institutions using the Normalization Process Theory. I

acknowledged that the study may be influenced by my experiences, which may shape the

interpretation of data. The consciousness of campus safety became a concern for me in

graduate school with the highly publicized trials of campus crimes and allegations that

higher education administrators mishandled reports that should have protected students

(Nobles et al., 2013). During Jerry Sandusky's trial, the publicized Penn State University

case aroused my interest in the Clery Act, especially the hefty fine levied against the institution. Since then, I have read various articles about campus crimes and actions taken by the institutions, especially why higher education institutions failed to comply with the Clery Act. I assumed that universities and colleges are not intensifying efforts to address violence on college campuses. I believe the Clery Act is complex and ambiguous as the constant changes to the Act keep broadening the scope of the law, thereby contributing to the errors, inaccuracies, or omissions in reporting crimes (Hanson & Cartwright, 2017). Despite my constructed personal assumptions about the Clery Act, this study was conducted with an open mind without giving room for any personal bias or experiences that will interfere with the integrity of this research.

The constructivist worldview formed the basis of the analysis in this research. According to Mann and MacLeod (2015), a worldview is the basis of our understanding and beliefs about the world. Often combined with interpretivism, constructivism is a worldview individuals seek to understand a phenomenon (Baxter & Jack, 2008). This paradigm emphasizes the creation of meaning by people, though it does not rule out the notion of objectivity (Baxter & Jack, 2008). The constructivism paradigm helped to collect participants' general meanings while studying the context or set of participants. It was appropriate for this study because it allows for evaluating the Clery Act within its context using various data sources (Baxter & Jack, 2008). According to Adom, Yeboah & Ankrah (2016), a constructivist philosophical paradigm is beneficial in the research of various studies of teaching and learning. Constructivists identify that the truth is relative and dependent on the individual's perspective. This paradigm emphasizes the creation of meaning by people, though it does not rule out the notion of objectivity (Baxter & Jack,

2008). The constructivism paradigm is consistent with my worldview and personal

experiences that help shape the study's understanding. Honebein (1996) asserts that the

constructivism paradigm is a method where people construct their understanding and

knowledge of the world by experiencing things and reflecting on those experiences.

Constructivism is based on the assumption of the social construction of reality. The

participants described their opinions through their accounts, providing insight and better

understanding for me (Baxter & Jack, 2008). The constructionist paradigm strengthens

the intrinsic case study to provide an in-depth view of the impact of the Clery Act on

higher education institutions.

Ethical Considerations

I addressed ethical issues in this study by getting approval from the Institutional

Review Board (IRB). Every University must have a committee to review and approve

individual interview proposals (Rossman & Rallies, 2017). The identities of the

participants were protected as required by law. Informed consent was obtained from

participants before the interviews. Data was securely stored for confidentiality purposes,

and there were no risks to participants in this study. The confidentiality of all participants

was maintained by keeping information about participants private. As a result, they

shared their experiences more freely without concerns about exposing themselves or their

institutions.

Rigor of the Study

Rigor is establishing the trustworthiness of the findings of a research study.

According to Connelly (2016), the trustworthiness of a research study is the measure of

confidence in the data. My experiences and views were identified to ensure that preconceived notions about the subject did not influence the analysis and findings of the study. All interviews were recorded and transcribed to ensure accuracy. I used Yardley's (2000) four principles of assessing research standards to establish the study's validity. Smith et al. (2009) stated that the various criteria identified by Yardley could be applied to qualitative studies, as shown below;

Sensitivity to Context

According to Yardley (2000), quality qualitative research should show sensitivity to context by embedding the findings in theoretical perspectives. The context of data in qualitative research comprises various parts with equal importance. All findings in this study were backed up with compelling empirical evidence, and my study ensured sensitivity to the different perspectives of the participants and the campus community (Smith et al., 2009). This study acknowledges the importance of context by using relevant literature to contribute to understanding the research. It provided an avenue for understanding the strategies used by campus security officers' responses to Clery Act changes.

Commitment and Rigour

Commitment and rigour can be described as a deeper engagement with the topic to understand the study (Yardley, 2000). Commitment is an extended engagement with the subject to develop competence and skill in the relevant data. Since 2012, the researcher has developed an interest in campus safety and the Clery Act and has followed the news, publications, and research related to the Clery Act. It entails developing the

ability and skills in the methods used in the study and immersing in the data (Smith et al., 2009). Rigour can be described as the totality of the data collected or analyzed based on the sample's adequacy. It entails getting all the information required for a comprehensive analysis. The study established rigor by using a thorough interview process with in-depth analysis and presentation of data.

Transparency and Coherence

Transparency and coherence ensure clarity and description of data presentation (Yardley, 2000). The study confirmed transparency and coherence by describing the data collection and analysis. Transparency was achieved by providing a detailed description of the coding process (Smith et al., 2009). This study adhered to the principles of a case study to ensure the valuable interpretation of data by disclosing all relevant aspects of the study. Coherence describes the fit between the research method and theory (Yardley, 2000). I ensured a fit between the research questions, theory, and method of analysis used in this study.

Impact and Importance

According to Yardley (2000), the real test of the validity of a study can be established when the methods employed have been laid out, analysis has been systematically done, and interpretation produces insightful, enlightening knowledge. This study used a systematic approach to review the implementation of the Clery Act guidelines. The importance of research is when the analysis draws on empirical data to create an understanding of a study under consideration. I analyzed the findings of this

study by making references to scholarly articles to ensure a proper understanding of the implementation of the Clery Act.

Credibility

According to Baxter and Jack (2008), the researcher must collect data using various sources to establish credibility. This study evaluated the impact of changes to the policy and the multiple strategies used to ensure compliance with the Clery Act using different data sources. The findings in this study provide valuable insights into Clery Act compliance from the shared experiences of campus security officers, focusing on determining how changes to the Clery Act impact higher education institutions. Credibility was determined based on the extent to which the study's conclusion conforms to what is already known in previous studies (Curry, Nembhard, & Bradley, 2009). This study will ensure the findings apply mainly to higher education institutions' coping processes with Clery Act changes. Curry et al. (2009) indicated that credibility promotes interpretations and the relationship between the researcher and participants' accounts of their experiences.

Summary

The Clery Act is a federal policy requiring higher education institutions to report crime statistics. However, the increasing lawsuits and fines for violations indicate that higher education institutions must accurately report crime statistics as required by the Clery Act (McNeal, 2007). There have been allegations that higher education institutions fail to prevent crimes and administrators mishandle reports that should have protected students (Nobles, Fox, Khey, & Lizotte, 2013). Parents and crime prevention groups

maintain that colleges and universities deliberately fail to report crimes to protect the institution's image and advocate that institutions accurately publish crime statistics while taking measures to prevent and respond to campus violence (Keels, 2004). Researchers must determine whether the Clery Act effectively reduces campus crime or enlightens students and employees about crime statistics (Fisher et al., 2002). In reporting campus crime, the media allege that higher education institutions are not taking appropriate measures to address violence on the college campus (Lighty et al., 2011). Campus security officers claim that they are putting in all efforts to ensure compliance with the Clery Act (Nicoletti et al., 2001). College administrators argue that the Clery Act is complex and ambiguous because the constant changes keep broadening the scope of the law, which has contributed to the errors, inaccuracies, or omissions in reporting crimes (Hanson & Cartwright, 2017).

This study examined the implementation of the new Clery Act guidelines in campus crime reporting using the Normalization Process Theory. With each amendment to the Clery Act, higher education institutions have to adjust their internal strategies and processes to accommodate the law (Dobbin & Kelly, 2007). The chapter justifies using a qualitative research method and a case study of participants from a single public institution with multi-campus locations. It identified the semi-structured interview methods used in this study and why they are appropriate. Data was collected using interviews with campus security officers and document analysis such as the institution's daily crime log and Annual security reports (ASR). Analysis of data provides a better understanding of the strategies employed by campus security officers to adapt to Clery Act changes and promote safety in the institution. This case study may offer meaningful

strategies for similar institutions to develop procedures to ensure compliance with the

Clery Act guidelines and create safer campus communities.

Chapter 4

Findings

This study examined how Clery Act administrators implement the new guidelines in campus crime reporting at EOA University. In October 2020, the U.S. Department of Education ended using the "Handbook for Campus Safety and Security Reporting," eliminating the Clery Act guidelines for administrators. The 265-page Clery Act handbook was replaced with a 13-page appendix briefly summarizing the new statutory and regulatory requirements (U.S. Department of Education, 2020). The significant changes in the Appendix are related to the Clery Act's geography, campus crimes, and campus security authorities. The Appendix no longer gives a specific measure for the geographical location (Juszkiewicz, 2020). The new guideline deleted all definitions for campus crimes as specified in the Clery Handbook and leaves the interpretation of campus crimes to the discretion of higher education institutions (Department of Education, 2020). The new guidelines emphasized delegating individuals with significant responsibilities for student and campus affairs as Campus Security Authorities, known as mandatory reporters of crimes (Nolan, 2020). Data for this study was collected from documents and interviews to evaluate the implementation of the new Clery Act guidelines.

Several documents were evaluated throughout this study. The records analyzed include Clery cover sheets, Annual Security Reports, Daily crime logs, and Daily fire logs. The Clery cover sheets give details of incidents identified as reportable crimes under the Clery Act. The Annual Security Report (ASR) for EOA University before and

after the new Clery guidelines for 2020 – 2022 was analyzed with the daily crime logs and fire logs for EOA University from November 2022 to February 2023. Data was also collected by conducting interviews with participants.

Participants

The participants from this study were selected from those working directly with reporting crimes and preparing the Clery Act reports as required by the U.S. Department of Education at EOA University. An email was sent to all participants identified, stating the study's objective and the need to obtain each participant's perspective to contribute to the literature on implementing the new Clery Act guidelines. A total of ten individuals participated in this study, and each participant met the sampling criteria. The criterion for selecting participants was to choose individuals with a shared responsibility of reporting, collating campus incidents, and ensuring compliance with the Clery Act. Six participants were members of the Clery committee designated to ensure compliance with the Clery Act. The other four participants are assigned as Campus Security Authorities because they must report all campus crimes to public safety. A pseudonym represents the participants to ensure their privacy.

Table 5 below describes the participants' departments, positions, and designation of participants with the Clery Act.

Table 5

Participant Demographics

Participants	Department	Position	Designation
Brett	Public Safety	Associate Director, Clery Compliance	Clery Committee
Alix	Public Safety	University Records	CSA
Leo	University Housing	Director, University Housing	Clery Committee
Matt	Public Safety	Assistant VP for Public Safety	Clery Committee
Hope	Student Affairs	Student Activist	CSA
Fred	University Library	Library Official	CSA
Mary	Public Safety	Campus Security	CSA
Zara	Health Center	Associate Director	Clery Committee
Zoe	University Counsel	General Counsel	Clery Committee
Grace	University Counsel	Assistant General Counsel	Clery Committee

Presentation of Themes

The participants took part in a semi-structured interview consisting of 10 questions. Each participant described their role in implementing the Clery Act guidelines, their campus crime reporting procedures, and how they collaborated with the Public Safety Department at EOA University. While each interview gave a unique perspective,

four themes emerged that were significant to implementing the new Clery Act guidelines at EOA University. The first theme contextualizing the new Clery Act guidelines was chosen because the officers had to interpret, implement, and modify procedures to ensure compliance with the requirements of the Department of Education. It was subdivided into determining Clery versus non-Clery crimes and establishing reporting boundaries. The second theme examined the internal management process because the participants from various departments on campus described how they work with the public safety department. It was divided into digitizing for efficiency purposes and checks and balances through audits. The third theme describes the building of the Clery reporting coalition. It was split into designating mandatory reporters and engagement through relationship building. The final theme is communicating Clery buy-in through training and educational programs. Table 6 below shows a map of the themes.

Table 6

Thematic Table

Main Themes	Sub-Themes
Contextualizing the new Clery guidelines	• Determining Clery versus non-Clery crimes • Establishing reporting boundaries
Towards an internal management process	• Digitizing for efficiency purposes • Checks and balances through audits
Building the Clery reporting coalition	• Designating mandatory reporters • Engagement through relationship-building

Main Themes	Sub-Themes
Communicating Clery buy-in through training and educational programs	

Theme 1: Contextualizing the New Clery Guidelines

The first theme of the study centered on how the Clery officers contextualized the new Clery Act guidelines. Contextualizing the new Clery guidelines can be described as giving meaning to a task to understand the new requirements and determine best practices to implement the new guidelines. Clery officers contextualize the guidelines to understand the requirements and review incidents reported in public safety based on their interpretation. They had to make sense to understand the expectations of the new guidelines. Implementing the new guidelines was based on the campus security officers' interpretation of a situation to determine incidents to include in the Annual Security Report.

My document analysis of the EOA University Annual Security Report (ASR) for 2022 gave insight into interpreting the Clery officer's implementation of the new Clery Act guidelines. In the new Clery guidelines, the Department of Education accepts a reasonable interpretation of terms as long as they are clearly defined in the reports. EOA University used definitions based on established standards. For example, the 2022 ASR report gave definitions of the categories of crimes identified by the Department of Education and explained the standards on which the definitions were based. The report stated,

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To count and disclose criminal offenses, hate crimes, arrests, and disciplinary referrals, statistics are based on definitions provided by the Federal Bureau of Investigation's (FBI's) Uniform Crime Reporting (UCR) Program. The definitions for Murder, Rape, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson, Weapons Carrying, Possessing, etc. Law Violations, Drug Abuse Violations, and Liquor Law Violations are from the Summary Reporting System (SRS) User Manual from the FBI's UCR Program. The definitions of Fondling, Incest, and Statutory Rape are from the FBI's National Incident-Based Reporting System (NIBRS) Data Collection Guidelines edition of the UCR. Hate Crimes are classified according to the FBI's Uniform Crime Reporting Hate Crime Data Collection Guidelines and Training Manual. The New Jersey Criminal Code statute for Prohibited Weapons definition is used for arrests and referrals for disciplinary action for weapons law violations, drug abuse violations, and liquor law violations.

The administrators assessed crimes by giving meaning and adopted definitions based on the new Clery Act guidelines at EOA University. The definition of crimes helped in the classification of Clery crimes and helped distinguish Clery from non-Clery crimes. The crimes listed in the Clery Act guidelines are called Clery crimes, while other crimes not listed in the Clery guidelines are referred to as non-Clery crimes. This theme is divided into two subthemes: determining Clery versus non-Clery crimes and establishing reporting boundaries.

Determining Clery Versus Non-Clery Crimes

This section describes how campus security officers identify crimes that should be reported to the Department of Education in the Annual Security Report. They must interpret an incident to determine the crime type and classify it as indicated in the Clery Act guidelines. The Clery guidelines require higher education institutions to collect data on four categories of crimes, namely, criminal offenses, sexual assault, hate crimes, and Violence Against Women Act offenses. The criminal offenses include criminal homicide, murder, non-negligent manslaughter, manslaughter by negligence, sexual assault, rape, fondling, incest, robbery, aggravated assault, burglary, motor vehicle theft, and arson. Hate crimes include robbery, theft, simple assault, intimidation, damage, and vandalism of property. Violence Against Women Act offenses include domestic violence, dating violence, and stalking. Furthermore, arrests and referrals for disciplinary action include weapons law violations, drug abuse violations, and liquor law violations. When an incident is reported to public safety and recorded, the campus security officers review the incident to determine crimes that are to be reported to the Department of Education.

The officers determine crimes to include in the Clery report by making sense of the incidents. They make sense of the incidents by looking at the reports and identifying those listed in the Clery guidelines. The Clery officers classify and report crimes based on their interpretation of the incident and include the crimes to be counted in the Annual Security Report. Sometimes, an incident may involve one or more offenses specified as reportable crimes under the Clery Act guidelines, as it is possible to have a Clery crime and a non-Clery crime in the same incident. A Clery crime includes all the offenses

specified in the guidelines as reportable in the Annual Security Report, while a non-Clery

crime is not one of the crimes listed in the Clery Act guidelines. According to Alix,

> There are situations where you could have criminal mischief from domestic
>
> violence. We had an incident where a girlfriend got mad at her and cut her shoes.
>
> So, we have domestic violence and criminal mischief. Domestic violence is
>
> counted, but criminal mischief is not. Still, in the world of Clery for domestic
>
> violence, any one of these categories and criminal mischief is one, so we have,
>
> you know, where the girl might call up and say My boyfriend just cut my shoes
>
> up, and the officer goes out to interview them and finds out his story. Her story
>
> comes back with a report to process, and I do my part to determine what is Clery
>
> and what is not. The report could say just harassment, but we decide whether it is
>
> domestic violence; the officers don't wear hats for Clery, so they write incidents
>
> but not for Clery. They put things that help us in records, but we have to track
>
> Clery incidents and report them.

In the example provided by Alix, Clery officers have to assess the incident to determine

items that fall under the Clery Act. The student called to report harassment, but the

campus security officer will review the situation to decide how to classify the incident for

Clery's purpose. Harassment is classified as domestic violence, which is reportable under

the Clery Act, while the cutting of her shoes involves criminal mischief, which is not a

Clery reportable item. This event is counted as one incident under the Clery Act, even

though you have criminal mischief from domestic violence. The ASR reveals that in

classifying incidents, reference is made to the definitions of the crimes in the State

Student Sexual Misconduct and Harassment Policy, FBI's Uniform Crime Reporting Hate

Crime Data Collection Guidelines and Training Manual, and definitions provided by the

Violence Against Women Act of 1994. The various definitions of crimes help to identify

crimes listed by the Department of Education. The campus security officers will interpret

each incident and identify Clery Act crimes to be included in the Annual Security Report.

Brett said

> When it comes into my office, I will review it and make some decisions to
>
> determine if it is a reportable crime that goes into the daily crime log and add it as
>
> a statistic. I work closely with the records clerk and review the reports to see if
>
> they are potentially Clery reportable crimes that we would carry on our statistics.

Clery Act forms have been designed based on the new guidelines to report crimes

specified in the new policy. Some incidents on campus are not included in the campus

crime records. The officer will analyze the situation to determine the type of incident, for

example, if the careless cooking caused a fire or triggered the alarm. When there is a fire

incident on campus, the incident is reported for record-keeping in the daily fire log, not

the daily crime log. The Department of Education requires an institution with an on-

campus student housing facility to submit and publish an Annual Fire Safety Report. Alix

said,

> These are the updated Clery cover sheets we call them. It has been updated based
>
> on the new crimes to report. We will put the case number and the date reported.
>
> You know, you can see the areas that need to be done, for example, our fire one.
>
> So we will get a fire alarm report. Okay. We will put the case number and the date
>
> reported. You know, you can see the areas that need to be done. Ninety percent of

these do not count careless cooking, but we still fill it out, and then it gets

attached to the copy of the fire alarm report.

In my document analysis of the Clery cover sheets used to record identified incidents, I

saw that the cover sheets had been designed to conform with the new Clery guidelines.

The Clery cover sheet gives details of the incident, the type of incident, and the type of

crime. The University records office has designed new Clery Act forms to conform with

the new classification of crimes specified by the US Department of Education. The cover

sheet does not count off-campus incidents, thefts, simple assaults, and DWI because these

crimes have been excluded from the Clery Act's reportable crimes and are not included in

the list of mandatory crimes to report to the Department of Education.

The records clerk completes Clery cover sheets designed to conform with the new

Clery guidelines. The Clery cover sheet gives details of the incident, the type of incident,

and the type of crime. Campus security administrators must determine crimes to report in

the Clery crime records, fire incidents in the fire alarm report, and other events for record

purposes. Identifying the crimes that fall under the Clery Act is based on the

classification of the Clery officers. Contextualizing the Clery guidelines helps to give

meaning to incidents based on the interpretation of campus security officers. Still, in

reviewing incidents, there is a need to determine reporting boundaries as specified in the

new guidelines to keep within the scope of the reporting guidelines. The Clery officers

analyze the reports of incidents collected within a geographical location in the immediate

surroundings of the campus community as specified in the Clery guidelines.

Establishing Reporting Boundaries

The new guidelines expect higher education institutions to record crimes occurring at properties owned by the institution within a geographical area to support the institution's educational purposes directly. In interpreting incidents and identifying crimes to be reported in the Annual Security Report, Clery officers establish boundaries of areas to include in the immediate surroundings of the institution as required by the new guidelines. They have to establish the locations to include as the new guidelines have left it to the discretion of campus security officers. The university keeps records of all incidents involving students near or surrounding the campus vicinity. However, only incidents within the immediate campus community are included in the Clery reports. The previous guidelines described the geographic area as one mile from the campus border. They expanded the geographical locations to be included in the reports and had incidences at institution-sponsored trips and international destinations. On the other hand, the new guidelines in the Appendix no longer give a specific measure for the geographical location.

From my document analysis, EOA University considers any building or property owned or controlled by the institution within a geographic area used to support the institution's educational purposes directly. The Annual Security Report identified geographical regions to be included in the Clery report as;

> Any building or property owned or controlled by an institution within the same
> reasonably contiguous geographic area and used by the institution in direct
> support of or in a manner related to, the institution's educational purposes,
> including residence halls, and any building or property that is within or

reasonably contiguous to paragraph (1) of this definition, that is owned by the

institution but controlled by another person, is frequently used by students and

supports institutional purposes (such as a food or other retail vendor).

The areas in direct support of an institution's educational purposes to include in the report

for Clery Act purposes have been left to the discretion of the campus security officers.

Each institution determines boundaries throughout its campus to include in the Annual

Security Report. Clery officers use reasonable interpretations to determine geographical

locations like public property, non-campus buildings, and off-campus locations to be

included in the Clery Act reports. According to Brett,

Regarding the geography or location to include in the Clery Act report, it has been

left to the university to make reasonable decisions for areas to include. They don't

need to know what happens here on Whitney Avenue; if it happens on our side,

our sidewalk, it counts, or if it occurs on the other sidewalk, it does not.

Therefore, campus security officers use reasonable interpretations and their discretion to

determine geographical locations to include in the Annual Security Reports. When

campus security officers get a report of incidents near the campus, they review it to

determine if it falls within the areas to count for Clery's purposes. There are times when

emergency notifications and timely warnings are sent to the campus community, even if

the location is outside the Clery geographical area of the institution. According to Matt,

For example, if you get a crime notice, say somebody was robbed close to the

campus. We evaluate the incident to determine if it is off-campus or close enough

to be included in the University Clery Act records. Even if it is off campus, it is

close enough to the campus, so we want to make sure our students are aware that

a robbery occurred there, so they are careful.

The University only includes statistics of crimes that occur in the immediate surroundings of the campus community. The public safety officers will use reasonable interpretations and their discretion to determine geographical locations to see if there is a need to send notifications. The Clery Act requires all institutions to send emergency notifications and timely warnings that could pose a threat to all students and staff members in the campus community. To ensure compliance with the Clery requirements, the institution collaborates with local law enforcement agencies with jurisdiction over the campus's geographical area.

EOA University has a Memorandum of Understanding with the local Police Departments in the county to ensure compliance with the Clery Act guidelines. The Department of Public Safety has employed collaboration with other agencies outside the campus to ensure they are not missing any incidents around the campus community. According to the Annual Security Report ASR, this external collaboration is vital as the County Police Department has police patrol jurisdiction over the campus locations, and to ensure accurate reporting of all incidents, the public safety department associates with other agencies outside the institution. The institution's mutual aid agreement with all the police agencies working closely with the EOA University Department of Public Safety includes coordinating patrols, participating in various criminal investigations, and sharing information. According to Brett,

The office of Clery compliance sends an annual request for information from the

local Police Department and the county Prosecutor's office to find out if they had

any crimes in their jurisdiction that they are handling so they can also review them.

The police departments communicate periodically and share information with the Department of Public Safety regarding criminal activity in the campus's surrounding areas. Occasionally, the records clerk receives the police arrests and booking list to confirm if there were any students involved with the police. If individuals listed are non-students, they are not reported in the incident records. Such incidents are recorded, but the data is not included in the Clery Act report if it is outside the immediate geographical area of the campus. According to Alix,

> We get the Police booking list of anybody arrested, which is another process to see if there are students or non-students. If there are students, then we report for time. We don't get reports; we get a booking list of individual arrests. They send the names, and we research and match them up to see if it is a student. If it is a student, we write up and go to the next one and do the same procedure, which probably per booking is 15 to 20 minutes. To verify students or non-students, we go through three different screens. If it is a student, that student is marked and goes on a separate spreadsheet, and then a cover sheet is sent to Brett. He fills out his part, and it gets sent back to us.

The record of arrests from the local police department's unit is sent periodically. Each time, the document is evaluated to identify if students are involved. It is done because the local police department has jurisdiction over the campus location. If no students are involved, the document is filed for records purposes. If students are involved, the

situation will be further evaluated to determine if it is an incident to include in the Clery statistics. According to Grace,

> We review incident records to ensure we are not missing any policy changes in the guidelines, including lists of arrests from the local police department. The incident is further examined to determine if it falls under the Clery Act.

The administrators at EOA University contextualize the new Clery Act guidelines by giving meaning to gain an understanding of the new guidelines, which helps interpret incidents and classify Clery and non-Clery crimes. The Clery crimes are those listed in the Clery Act guidelines to be reported in the Annual Security Report, and any other crime not listed in the guidelines is a non-Clery crime. In reviewing incidents, there is a need to establish geographical boundaries in the immediate surroundings of the campus community to keep within the scope of the reporting guidelines. Implementing the Clery guidelines requires a system, which is the reason for examining Clery's internal management process.

Theme 2: Towards an Internal Management Process

The internal management process describes the system of recording and collating campus crimes to ensure compliance with the Clery Act guidelines. It shows the established standard operating procedures to collect and record incidents at the institution. The Clery guidelines entail collecting reports of incidents reported to public safety and submitting an Annual Security Report to the Department of Education. Clery officers at EOA University saw a need to improve their online reporting system; after making sense of the new guidelines, they had to determine how to modify their

procedures. The new guidelines prompted a new online system for easier reporting and recording. They had to adapt a new set of practices to implement the new Clery guidelines. They established a system to ensure the accurate recording and collating of records by digitizing their record-keeping system. This theme is divided into two subthemes: digitizing for efficiency purposes and checks and balances through audits.

Digitizing for Efficiency Purposes

Digitizing is a system adopted by the Clery administrators to ensure an effective collection and collation of statistics of incidents reported to public safety. Digitalizing for efficiency can be described as adapting computers, technology, and the internet to improve manual systems, which is essential to ensure accurate reporting and avoid the consequences of non-compliance with the Clery Act. Under the previous guidelines, a spreadsheet was used, and forms were completed for each incident with details of the incident, the date it occurred, and the type of violation or campus crime, and each was assigned a case number. The Clery Act officers saw the need for a more detailed online system to help record incidents, collate data, and filter data for Clery Act purposes. The records of incidents are now entered into an online database to make it easier to review and evaluate information. Alix from the university records office said,

> EOA University uses a new online system as we switched systems, so we are all still learning. This is a more detailed process of what we do electronically. All incidents are channeled through our records department for filing. I would say discovery purposes; lawyers need discovery for an incident for court and Clery

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purposes. This is how our records first come about: how they are reviewed, how

they are collated, and how they are stored.

Various departments within the campus report incidents to public safety using a new

online software called Maxient Reporting System. The new online system makes it easier

to collate data accurately for Clery's purposes. The previous method of reporting

incidents to public safety was using forms or making phone calls to report incidents. The

new Clery guidelines prompted the need for a more reliable means of reporting incidents.

Alix and Brett are directly involved in the collation of Clery Act data, and they both said

the new online system was more comprehensive than the old system. They now have

more sections to describe incidents and not just statistics. According to Brett,

> Maxient is the software platform that maintains incident reporting for multiple
>
> offices at the University Residential Learning and University Housing, Dean of
>
> Students Office, and Community Standards Office. The online reporting system
>
> makes it easier to handle incidents properly. I am looking at the contents
>
> regarding the Clery Act, which makes it easier to manage records online. It makes
>
> identifying incidents on the lists easier, and I can flag specific incidents and put
>
> my initials.

The EOA university reporting system was designed to keep records of all incidents

within the campus, not just the Clery Act crimes. Therefore, daily records are collated

from all incidents responded to by the campus police, reports by campus security officers,

including all calls made to the call center, and all incidents reported to the various

departments. The campus safety and emergency services section receives notice of all

incidents at EOA University through the 24-hour dispatch center and the electronic system called Maxient. According to Leo,

> Incident reports are submitted to Public Safety using the Maxient Reporting System. They have been trained on things to look out for and how to report all incidents on the electronic system.

All incidents, not just criminal activities, are submitted electronically to public safety. Reports from the campus community members who see suspicious activities are included in the records. These reports can include criminal activity, emergencies, and public safety problems on each campus directly to Public Safety. Fred said

> Fortunately, we do not have many incidents, but when we do, all incidents are reported electronically to public safety. We call the campus police in case of incidents and follow the appropriate procedures to keep students in the building safe.

The revised electronic system of records keeping in response to the new Clery Act guidelines was set up to make the collation and evaluation of statistics easier to manage, as seen in participant responses. In addition, the record-keeping process gives room for more detailed records to make it easier to filter data for Clery reportable crimes to ensure compliance with the Clery Act. Implementing the new Clery Act guidelines requires checks and balances to ensure adherence to the requirements. EOA University conducts checks and balances of its procedures through periodic audits.

Checks and Balances Through Audits

Checks and balances is a system in place at the institution where records and procedures are reviewed periodically to ensure compliance with the Clery Act guidelines. The internal structure was set up to provide checks and balances to their practice to comply with the Clery Act and avoid consequences of non-compliance. The campus security officers changed their procedures by modifying their online recording system. The Clery Act requirements require diligence to ensure that the institution is not missing any data that should be reported to the Department of Education. Periodic audits are conducted to ensure proper implementation of the new guidelines. EOA University has internal audits and employs external auditors when they need to evaluate their practices to ensure that the institution maintains appropriate standards as required by the Clery Act. They make suggestions and identify areas for improvement to enable the institution to avoid liabilities. Grace said,

> We conduct periodic audits of the procedures and practices used in various departments on campus. Regarding the Clery, we meet regularly to discuss it to ensure that the institution meets its legal obligations. We advise and recommend keeping up with standard practices to ensure compliance.

Clery officers at EOA University use internal audit reviews to determine the adequacy and effectiveness of their internal controls, adherence to applicable laws and regulations, and reliability of financial reporting. The institution has routine checks to ensure the procedures align with the Clery guidelines. According to Zoe,

The other piece, I will say, is what happens through the office of internal audit; we have auditors on staff at the university. They audit different things on a timely basis every few years, and the Clery Act is one of those things. We have some audit processes for every law we must abide by at the university. We make a formal evaluation of processes on our side. They do a policy check and review incident reports, Annual Security Reports, and crime logs. So, they do a quick policy check against the data to ensure we follow our policies. If they identify a problem, we can then implement a remediation plan.

EOA University also employs the services of external auditors to evaluate their internal procedures to ensure that the practices will enhance compliance with the Clery Act. Assessing the practice helps the Clery administrators determine the new process's strengths and weaknesses. The auditors come with different perspectives and drill into every aspect of Clery Act procedures. Brett explained,

Some years ago, we did an audit; a few auditors came in from, say, Staff and Associates, and they have a different perspective and drill into everything, and they are very detailed. And gave us a report with things that needed to be updated with recommendations. My predecessor handled that, and my supervisor went about implementing those recommendations and changes.

Audits are conducted internally and externally, with measures taken to ensure that the institution complies with the requirements of the Clery Act. In addition, it helps administrators evaluate if their procedures are effective and constantly seek new, more

efficient ways to address campus safety. Zoe explained why EOA University used the services of external auditors.

> Occasionally, we may say that we reviewed the Annual Clery Report and that the report shows issues with the policy, which is why we are getting external auditors to do an internal audit that they lead. A few years ago, we had external auditors because we felt that there were some areas where our compliance areas needed to be improved. So, at that point, we hired an external consultant to come in and audit the entire process. From a strategic position, we engaged in outside resources where necessary; for instance, we engaged in an audit of our practices. We hired an expert to come in and review our files to identify any concerns and ensure we took any appropriate remedies they selected.

The audits give detailed reports of areas to update with recommendations and changes. At EOA University, the regular use of internal auditors and the occasional service of external auditors as needed helps administrators redefine procedures or modify ways of doing things to ensure compliance with the Clery Act guidelines. The university also receives feedback from the campus community from students and staff to evaluate their practices and ensure compliance with the Clery Act. The internal management process for Clery at EOA University describes the process of recording and collating campus crimes to ensure compliance with the Clery Act guidelines. It examined digitization for Clery's purpose, prompted by the need for more efficient means of collecting and collating statistics. Audits are conducted periodically to ensure checks and balances and compliance with the Clery Act. Implementing the requirements of the Clery Act requires the Department of Public Safety to connect with other departments and offices. Clery

reporting entails collaborating with those who would contribute to the reports submitted to the Department of Education.

Theme 3: Building the Clery Reporting Coalition

Building the Clery reporting coalition describes the efforts made by Clery officers to build relationships with various departments within the institution for the Clery Act. It discusses the interaction with other campus community members to ensure compliance with the Clery Act. Campus security officers at EOA University employ purposeful interaction to work out participation among designated individuals who collate campus crime statistics and ensure compliance with the Clery Act. They engage with others to provide collaborative contributions to Clery's compliance. This theme is divided into two sub-themes: designating mandatory reporters and engagement through relationship building.

Designating Mandatory Reporters

The Clery Act requires specific individuals who have significant responsibility for students and campus activities to be designated as mandatory reporters of crimes, known as the Campus Security Authority (CSA). According to the US Department of Education, all institutions are to collect crime reports from individuals called "Campus Security Authorities" under the law for records to be included in the Annual Security Report. The security officers receive reports of incidents from various campus community individuals designated as mandatory reporters.

My document analysis of the Annual Security Report revealed that CSAs at EOA University include University Police and Security Officers, Event Security Staff, Deans,

Advisors, Department Heads, Chairs, Directors, University Housing professional staff, student activities staff, Director of Athletics, all athletic coaches (including part-time employees and graduate assistants), Faculty /Staff advisor to a student group, Community Directors and Community Assistants, Title IX Coordinator/Investigator, and Director of a campus health or counseling center. EOA University officers designate those with significant authority over student affairs as Campus Security Authorities, and they are to report all crimes directly to the Department of Public Safety or immediately call 911. The designated individuals have an obligation to report all crimes as part of their responsibilities and to ensure compliance with the Clery Act and promote campus safety. Leo said,

> I manage the university housing department, and many staff in our department are considered in the Clery sense Campus Security Authority. They have an obligation to report crimes when they learn about a crime that has occurred. They have a responsibility to report what should be recorded with Clery compliance. Statistical information for the Annual Security Report and public safety information that can be considered for things like a timely warning or emergency notification that might go to the campus, so that's my primary role in relation to the Clery. I supervise a large number of those
>
> designated as CSA.

Campus Security Authorities are identified by their position as having direct contact with students, such as staff members and student workers. The Office of Clery compliance has identified certain positions that qualify a person as a Campus Security Authority. Staff

and student workers in such positions are automatically required to report all incidents to public safety as part of their role in that position. The supervisors of the departments with direct responsibilities over student affairs, such as student housing and resident life, student affairs, and health center, are notified of their duties to report all incidents to public safety. Brett said,

> I look up those designated as campus security authorities by their position. I send
>
> notifications to supervisors in different areas with direct roles towards students,
>
> like student affairs, residential learning, and the health center. I get a list of
>
> anyone who falls under their area and ask if other staff members work in that
>
> capacity or if a new position was created. So we try to have that kind of
>
> communication to decide and determine who they are. I also get a list of some
>
> student staff members who are student resident assistants from the residential
>
> learning office.

Mandatory reporters of crimes do not wait to get a report from victims, but they are required to report all crimes they see around campus. They must be vigilant to make decisions about situations they encounter. Suspicious activities are to be reported as the reports may help to determine if there is a serious or continuing threat to the campus community. Campus Security Authorities must report every incident to public safety to promote a safe campus environment. According to Mary,

> My job is to inform the campus police of any issue I see around my post on
>
> campus. I will make a call, and they will take the reports when they come to

investigate. I don't write a police report, but they will do that after they arrive. I hand out these slips to ensure everything is orderly and safe.

Individuals designated as Campus Security Authority must make a report with or without the victim's support. Some victims of sexual assault may not want the school authority involved because of the publicity it may bring. The victim's identity will be kept confidential, but the university must report and investigate the incident regardless of the victim's support. According to Zara,

> We must report crimes reported to us or crimes we notice at the health center. In most cases, the students are not willing to talk about it, especially when it is a sexual assault case. Our staff members will take note of specific information to be passed on to public safety, even if the victim does not want to disclose details of the assailant. The victim's identity is protected, but the incident details are sent to public safety.

All those identified as Campus Security Authorities are responsible for reporting all crimes to the University's Public Safety. They are required to make the report with or without the support of the victims to ensure they fulfill their obligation by their position. Officials at EOA University have maintained a relationship with agencies outside the institution to satisfy the requirements of the Clery guidelines and promote a safe campus community. The campus security officers also deliberately build relationships with various individuals to promote Clery Act compliance.

Engagement Through Relationship-Building

Engagement through relationship building discusses how Clery compliance officials connect with those directly responsible for student affairs and the campus community. The Clery Act requires those with significant responsibility over student affairs to report all incidents to public safety. The office of Clery compliance takes it a step further to ensure that their office builds relationships with those who contribute to Clery compliance. The goal of the interaction is to remind the staff members of the significance of their contributions to the new guidelines. The security officers at EOA University engage with others to build relationships and work collaboratively to ensure compliance with the Clery Act. According to Brett,

> I am approaching my interactions with colleagues and different offices and departments at the University from a relationship standpoint. I think I am not a fire and brimstone, you know, if you don't do this, you will have us fined $52,000 for every violation. I don't think it might impact some, but it doesn't affect everyone. You know it is not the best way to make friends and influence people. I think that kind of relation, forming relationships out there with the different offices, getting into various committees on campus to make sure that they know what is going on.

Public safety officers relate with students to create Clery's awareness and build trust with the campus community. They intend to develop a sense of safety while connecting with students and ensuring a safe environment. As the Clery Act requires, EOA University officers advise students to keep them from things that may endanger their lives. Students

are reminded of actions to take to protect themselves and others. They make conscious efforts to connect with students while presenting themselves as approachable. Matt said,

> One of the things I tell parents is that their sons and daughters, and I get to speak with some students throughout the semester, have a sense of safety and security awareness. Be aware of your surroundings, don't walk in a tunnel, and don't put earplugs; you get oblivious to your surroundings.

In addition to building relationships with students, the campus security officers intentionally interact and form relationships with other institutions' departments to create awareness and promote compliance with the Clery Act. At the various meetings, we discussed incidents at other universities and how to prevent such incidents from happening at the institution. Alix said,

> They used to bring incidents in other higher education institutions to our attention and say this happened at AB State University; they got fined X amount of dollars. We have got to make sure that we don't let that happen. These discussions keep us sharper, in my opinion, and they keep us that we remain compliant.

The interactions of campus security officers with various departments at the institution are to promote Clery awareness and discussions that we help to contribute to compliance with the Clery Act. In addition to interactions within the University, the Department of Public Safety officials at EOA University work collaboratively with external law enforcement agencies with jurisdiction over the campus locations. This section explains how Clery officers build relationships with those required to report all incidents to public safety; the campus security officers connect with students to create Clery awareness and

promote a safe campus community. They work with various departments within the

institution by employing purposeful interaction to work out participation among

designated individuals that collate campus crime statistics to ensure collaborative

contributions to Clery compliance. Communication is a significant tool used in

connecting the campus community.

Theme 4: Communicating Clery Buy-in Through Training and Educational

Programs

The Clery Act requires higher education institutions to disclose all campus crime

statistics while taking initiatives to keep the campus safe. Promoting Clery buy-in

awareness through training and educational programs describes the programs designed to

create awareness and promote cooperation with the Clery Act. EOA University provides

various educational awareness and prevention programs for the campus community. They

are essential because they employ proactive measures throughout the campus, promote

safety awareness, and offer multiple training programs. The educational programs consist

of primary prevention and awareness programs for all incoming students and new

employees and ongoing awareness and prevention campaigns for all students and

employees. The two aspects of communicating the Clery buy-in are through training and

education programs. Clery awareness is promoted by providing proactive training for

students and employees and student support through programming.

The proactive training provided by EOA University, as per the Clery Act

regulations, requires institutions to inform students of safety issues so that they can make

informed decisions about protecting themselves. In addition, training keeps the campus

community abreast of actions to take in dangerous situations and saves lives. EOA University has various training for the campus community, such as active shooter training. Students are taught procedures in case of an active shooter, with additional instructions on the website. Students and staff members are encouraged to call 911 if they encounter anyone in the building who is behaving in a way that seems suspicious, such as trying to hide, entering unauthorized offices, or attempting to conceal a weapon. Most of the training is focused on emergency preparedness and procedures in case of an active shooter situation. According to Matt,

> We do a lot of training. We have these goggles, a set students can put on their eyes, and it acts like you've been drinking. Then we watched how they walked, and other students could see that they were called drunk goggles. All we do here is very proactive, very proactive in our high visibility uniformed patrol; high visibility uniform means police officers in uniform that are throughout the campus will create an air of people out there watching, so I'll use this term. So the wrong person doesn't get any ideas to do anything. It is being proactive in crime prevention, and officers mainly do it. And it is good for the officers to meet the students so people have that partnership. They know I saw Officer Mike, who taught me active shooter training. I will say that I learned a lot from Officer Mike; that is how we are very proactive in training to get the message out. You know, proactive stuff from everything that can harm somebody, and we try to do it in a very proactive positive way, where people can get the message and keep aware of criminal activities.

The public safety department provides information to the campus community about actions to take in the event of an emergency that threatens public safety. The office of Clery compliance conducts annual training at the various departments within the University. The campus community learns about procedures victims should follow in case of domestic violence, dating violence, sexual assault, and stalking. Brett said,

> I plan to contact some of the contact supervisors to offer in-person training since we have gotten away from COVID-19. My office historically has gone to do training with the resident assistants who, you know, public safety and the resident assistants, receive the overwhelming majority of this information. So, I want them to be comfortable through other organizations like advisors, students, athletics, and coaches. I want to reach out to specific groups to engage them so they can be free to ask questions.

Zoe said,

> I occasionally participate and provide Clery training at the university on particular issues we have identified or that they can benefit from additional education or opportunities to discuss the problems of Clery discussions and table topics to ensure we are handling matters well.

The Department of Education requires periodic fire drills and training on what to do in case of a fire emergency. The various departments are reminded of procedures and meeting points to assemble in case of a fire. The Public Safety unit is responsible for teaching evacuation procedures in the different buildings on campus. According to Fred,

We have periodic training like fire drill training, where staff and students practice

what to do in the event of a fire and where we are reminded of procedures to take

to protect students during a fire incident.

Individuals designated as Campus security authorities are trained regularly within the

year because of their responsibilities to be vigilant and proactive when they receive

reports or see incidents within the campus. EOA University uses online training for

individuals designated as mandatory reporters of campus crimes. They are trained

regularly to identify things to look out for when they come in contact with students.

According to Zara,

We have been trained to identify cases of sexual violence that come to the health

center. Our position requires us to provide appropriate services to the student and

report the incident to public safety. We keep all students' information confidential

to protect the identity of the victims. Usually, most students are reluctant to

provide information because of the stigma associated with their experiences. Still,

our training helps to identify salient information that is required from the students

in most cases.

EOA University uses training materials from the Clery Center, a national nonprofit

dedicated to helping college and university officials meet the Clery Act requirements.

They equip professionals with the training and resources to understand the Clery

compliance requirements. Most of the training, webinars, and resources used by the Clery

office at EOA University are from the Clery Center. Brett said,

The Clery center who I am sure you are familiar with the Clery Center. So the

Clery Center offers online training to universities who are members, and it

provides a link with pre-test and post-test, and I like that quite honestly. It's a few

years old, but they did some videos on our campus. I think the Campus Security

Authorities need to know when a student comes to them and says I don't know

what to do with this information. I want them to understand how to engage the

student, ask follow-up questions, and get the student's appropriate support service.

Some training is prompted after a review if a need to change certain practices or adopt

additional procedures is needed. The campus security officers at EOA University create

Clery awareness and buy-in by providing training relating to the Clery Act. Periodically,

they enlighten students and staff on actions to take in an emergency. The campus

community is educated about the Clery Act to promote buy-in and sustain awareness.

This section explains the various programs the Department of Public Safety offers

to support students and promote a safe campus community as required by the Clery Act.

Most programs are crime prevention, security awareness, and student support programs.

EOA University offers awareness prevention programs for all incoming students and new

employees, with ongoing awareness and prevention campaigns for all students and

employees. They present suicide prevention, alcohol and drug awareness, mental health,

sexual health, and sexual violence programs. In addition to these programs, Public Safety

sends periodic messages to promote safety awareness in compliance with the Clery Act

guidelines. Students learn to be aware of their surroundings and be more security

conscious within the campus community. According to Matt,

I know crimes happen worldwide, as we see in the news. One of the things I tell

parents is that their sons and daughters and I get to speak with some students

throughout the semester, and they have a sense of safety and security awareness.

Be aware of your surroundings. Don't walk in a tunnel, don't put earplugs, and

you get oblivious to your surroundings. Security awareness is number one in

making sure you have a safe environment. Students will think they have all their

studies and are doing a lot, but I don't want safety awareness to slip through the

cracks. This is why we send out periodic messages about safety awareness.

There are several resources available for students, especially victims of assaults or

violence, through the University Health Center. Students are entitled to these services

regardless of race, background, or socio-economic status. EOA University members have

the right to access and benefit from the university's educational programs, activities, and

services. All student information is kept confidential to protect the identity of the victims.

Hope said,

I work with other student organizations to assist students who have fallen victim

to various sexual violence. We work to link the students with multiple resources

and services within and outside the campus. It takes courage for most of these

students to come forward, so we confidentially assist them. We work to provide a

support system for the students. Our main work is to support students who have

fallen victim to sexual crimes.

The Department of Education works with several student groups on campus. They work

with these groups to promote the Clery objectives and boost students' confidence in the

campus security efforts. The programs are directed to prevent crimes and promote security awareness. They educate students on appropriate actions to avoid becoming victims of crimes or engaging in criminal activities. According to Matt,

> Our officers will also work with some student groups to do what we call drunk driving awareness, drinking awareness, alcohol awareness, and drug awareness. We are not accusing anyone of doing drugs or drinking, but we want to give them the message: If you drink, don't drive; if you drink and your friend's drinking and they get into the car to go, don't get in that car, stop your friend from getting in that car. First of all, you are not drinking until you are 21, but if you are going to drink, don't be irresponsible. So, there are different programs that our police officers set up with students throughout the semester. We have programs that we educate populations on; we are constantly reviewing them to ensure we have the latest information.

The final theme on communicating Clery buy-in through training and educational programs explains what EOA University does to promote campus safety and comply with the requirements of the Clery Act. The two aspects of communicating the buy-in at EOA University are through training programming. The proactive training for the campus community is to inform students of safety issues so that they can make informed decisions about protecting themselves. The programs at EOA University are to provide ongoing awareness and prevention campaigns for all students and employees. Proactive training and student support programs are some of the measures taken by EOA University to prevent campus crimes and promote a safe and conducive campus community.

Summary

This study focused on implementing the new Clery guidelines by EOA University. The data was compiled from interviews with Clery Act administrators, committee members, and campus security authorities. Four themes emerged from the study: contextualizing the new Clery guidelines towards an internal management process, building the Clery reporting coalition, and communicating Clery buy-in through training and educational programs. Several subthemes emerged from the themes that helped to analyze the central theme in greater detail. In conclusion, the findings indicated that implementing the new Clery Act guidelines prompted changes to procedures and existing practices. EOA University officers implemented the new guidelines by building a Clery reporting coalition and building relationships through communication to promote Clery compliance.

Chapter 5

Discussions, Implications, and Recommendations

Campus crime was brought to the limelight by the enactment of the Clery Act after the death of Jeanne Clery in her college dorm. An investigation discovered that thirty-eight violent crimes had occurred on the campus for three years before Jeanne's death, and the information was withheld from the public (Sloan & Fisher,1995). As a result, the Clerys began a national campaign for campus security laws. They lobbied for policy changes, resulting in the Student Right to Know and Campus Security Act, which was later renamed the Clery Act (Clery, 2020). The Clery Act requires all colleges and universities participating in federal financial aid programs to keep and disclose information about crimes on and around their campus community for the preceding three years. The goal of the Clery Act was to ensure higher education institutions take action to protect students and promote a safe learning environment (Sloan et al., 1997). After 30 years of the Clery Act, several changes have occurred, with an increasing number of lawsuits, violations, and penalties indicating that institutions are not accurately publishing crime statistics and taking measures to prevent and respond to campus violence (McNeal, 2007). The increases in violent crimes in higher education institutions prompted the Federal government to enact laws under the Clery Act mandating colleges and universities to publish their crime statistics and security policies. However, the constant changes to the law have created concerns for higher institutions (Solovay, 2016; Wood & Janosik, 2012).

This study examined how campus security administrators implement the new Clery Act guidelines in crime reporting. The policy implementation process begins with the policy decisions of the implementing agencies (Mazmanian & Sabatier,1991). Implementing a new policy starts with the response of the implementing officers, who will make sense of the new guidelines and plan how to implement the changes. According to Finch et al. (2012), the sense-making and response of a practice by officers will promote or hinder the effective implementation of a practice. Clery Act officers must understand and make sense of the new guidelines to plan how to implement changes to the Clery Act. This study evaluated the procedures employed by higher education institutions to report campus crime in response to the new Clery Act guidelines and discussed the strategies used by administrators to assess their implementation of the new Clery Act guidelines in campus crime reporting. Individuals in a set of practices can seek to determine the effectiveness of their method of practice (May et al., 2015).

This research analyzed direct information using the words, phrases, and comments from campus security officials to gain insight and understanding of the implementation of recent changes to campus crime reporting. The findings of this research will provide insights for campus security officers and university administrators on how institutions have implemented changes to the Clery Act guidelines. The knowledge acquired from this study will provide insight into implementing the new Clery Act guidelines in campus crime reporting. It will evaluate how higher education institutions are interpreting Clery Act regulations and help to achieve a safer campus community.

Discussion of Findings

I conducted interviews that were centered on the implementation of the new Clery Act guidelines. Implementing the new Clery Act guidelines was based on the sensemaking and understanding of administrators. The Department of Education replaced the 265-page Clery Act handbook with a 13-page Appendix that briefly summarizes some statutory and regulatory requirements (U.S. Department of Education, 2020). Administrators have to understand and make sense of the new guidelines to be able to plan accordingly. The sense-making process involves understanding what organizations must do to promote a practice (Finch et al., 2012). They have to contextualize the new Clery guidelines by giving meaning to the task. The Clery administrators review the guidelines to understand the requirements and implement changes based on their perception of the requirements. Since the determination and classification of campus crimes have been left to the discretion of Clery administrators, they make sense of the incidents to determine whether they fall under the crimes specified in the Clery guidelines.

Administrators planned their approach to implementing the new Clery Act guidelines based on the meaning of the change, and the process was based on the extent of meaning made by participants (Finch, 2012). When an incident is reported to public safety and recorded, the campus security officers review the incident to determine crimes that are to be reported to the Department of Education. Sometimes, an incident may involve one or more offenses specified as reportable crimes under the Clery Act guidelines, as it is possible to have a Clery crime and a non-Clery crime in the same incident. The participants' understanding and meaning of the situation influenced their

approach to determining Clery crimes and crimes not listed under the Clery Act. They had to determine the crimes reportable under the Clery Act from the daily record of incidents.

The university keeps records of all incidents involving students near or surrounding the campus vicinity. However, only incidents within the immediate campus community are included in the Clery reports. According to Fisher et al. (2002), the new guidelines expect higher education institutions to record crimes occurring at properties owned by an institution within a geographical area to support the institution's educational purposes directly. Therefore, campus security officers use reasonable interpretations and their discretion to determine geographical locations to include in the Annual Security Reports. The Clery Act requires specific individuals who have significant responsibility for students and campus activities to be designated as mandatory reporters of crimes, known as the Campus Security Authority (CSA) (Juszkiewicz, 2020). EOA University officers designate those with significant authority over student affairs as Campus Security Authorities, and they are to report all crimes directly to the Department of Public Safety or immediately call 911. The designated individuals are obligated to report all crimes as part of their responsibilities, ensure compliance with the Clery Act, and promote campus safety (Department of Education, 2020). They must be vigilant to make decisions about situations they encounter. Suspicious activities are to be reported as the reports may help to determine if there is a serious or continuing threat to the campus community. To promote a safe campus environment, Campus Security Authorities are to report every incident to public safety, who will investigate and determine if it has to be included in the Clery Act report.

I analyzed the daily crime and fire logs for EOA University from November 2022 to February 2023. The logs keep records of incidents reported to Public Safety within two business days of receiving the report. The logs record the type of incident, the date the incident was reported, the time and date, and the location (Clerycenter, 2020). I discovered that daily crime logs keep records of all incidents, whether they are Clery reportable crimes or not, but only offenses specified in the guidelines are reported. The reportable incidents are identified and recorded on the Clery cover sheets. The Clery sheets are forms completed for each incident classified as a reportable crime. The documents are completed for filing and extra records purposes. I reviewed the Clery cover sheets to evaluate the implementation of the new Clery Act guidelines. The Clery cover sheet gives details of the incident, the type of incident, and the type of crime. I discovered that the Clery cover sheets are designed to conform with the new classification of crimes specified by the U.S. Department of Education. The cover sheet does not count off-campus incidents, thefts, simple assaults, and Driving While Intoxicated (DWI) because these crimes are not on the list of mandatory crimes to report to the Department of Education. They no longer had to count theft, robbery, and simple assault that occurred off-campus under the criminal offenses, hate crimes, and VAWA offenses. Also, DWI that happened off the geographical area of the campus community is excluded from the statistics of liquor law, drug law, and weapons violations as indicated on the form.

I compared the Annual Security Report (ASR) for EOA University before and after the new Clery guidelines for 2020 – 2022. The 2022 ASR published after the new Clery Act guidelines gives a more detailed description of the reporting procedures at

EOA University. It includes additional procedures for reporting criminal activity and emergencies and updates the individuals designated as Campus Security Authority CSAs. For example, before the new policy, the ASR had a more comprehensive range of individuals designated as CSAs. However, the 2022 ASR limits CSAs to those with significant responsibilities over student affairs by specifying Deans, Advisors, Department heads, Chairs, and Directors. The new Clery Act guidelines identified those designated as Campus Security Authority as having significant responsibility for students and campus activities. EOA University only designates individuals with significant student responsibilities as Campus Security Authority. They report all crimes directly to the EOA University Department of Public Safety by immediately calling Public Safety or by using the Maxient Reporting system.

The Annual Security Report explains the procedure the students and staff take in case of an emergency. When calling to report an incident, the caller will provide the location of the emergency and indicate where they are at EOA University. They will give a phone number, the nature of the emergency - medical, police, and the status of the emergency. If it is in progress or complete, they are to report if there is a need for medical or other assistance and any immediate threat to life. In addition, the caller will have to give a description, location or direction of travel of suspect(s), description of motor vehicle(s) involved, presence of weapons, and if there are any dangers to emergency responders. The caller must remain on the telephone until the dispatcher has disconnected. There are systematic procedures throughout the campus community to report incidents to public safety. The EOA University campuses have emergency phones

placed strategically throughout the campuses. Callers can push the button for assistance, connecting them to the Department of Public Safety Communication Center.

The new Clery Act guidelines eliminated all definitions for Clery crimes. They replaced them with references to regulatory sources but left the definition of crimes to the discretion of campus security officers (Murakami, 2020). From the ASR, I discovered that EOA University uses definitions provided by the Department of Education and the state law about the type of behavior that constitutes domestic violence, dating violence, sexual assault, and Stalking. They use definitions of specific behavior and actions in the State of New Jersey and the definition of consent found in the Student Sexual Misconduct and Harassment Policy. 'The definitions for murder, rape, robbery, aggravated assault, burglary, motor vehicle theft, arson, weapons carrying, possessing, law violations, drug abuse violations, and liquor law violations are from the Summary Reporting System (SRS), the user manual from the FBI's UCR Program. The definitions of fondling, incest, and statutory rape are from the FBI's National Incident-Based Reporting System (NIBRS) Data Collection Guidelines edition of the UCR. Hate Crimes are classified according to the FBI's Uniform Crime Reporting Hate Crime Data Collection Guidelines and Training Manual. Although the law states that institutions must use the UCR Program definitions, Clery Act crime reporting does not have to meet all other UCR Program standards. In addition to the documents, data was also collected from interviews with various participants.

EOA University has a Memorandum of Understanding between the local Police Departments in the county to ensure compliance with the Clery Act guidelines. May et al. (2015) identified the need for participants to collaborate to get support for a new practice.

The campus security officers collaborate with other outside agencies to ensure they are not missing any incidents around the campus community. According to Senge, systems thinking is a process that shows the interrelationship between unrelated groups. It relies on collective intelligence that allows seeing how various elements fit together to achieve a common goal (Senge, 1990). This external collaboration is vital as the County Police Department has police patrol jurisdiction over the campus locations—the public safety department associates with other agencies outside the institution to ensure accurate reporting of all incidents. The institution's mutual aid agreement with all the police agencies working closely with the EOA University Department of Public Safety includes coordinating patrols, participating in various criminal investigations, and sharing information.

The participants identified the internal management process used in implementing the Clery Act. McNeal (2007) identified that most Clery Act issues result from a lack of appropriate strategies and formal structure for Clery Act requirements. Higher education institutions must implement proper practices and make changes to ensure accurate Clery Act reporting. Most of the record-keeping at EOA University is online using a shared database or spreadsheet. The campus security officers had to navigate the changes by upgrading their digital system to meet the new demands of the Clery Act. When a new policy is established, an organization has to make sense of it, plan how to implement it, and take action based on the meaning of the change (Finch, 2012). The new guidelines require higher education institutions to reclassify incidents based on the revisions. Most participants referred to the new online or electronic system of reporting incidents to public safety. The Clery Act officers saw the need for a more

detailed online system to help record incidents, collate data, and filter data for Clery Act purposes. The participants explained that the lateral coordination of work at EOA University shows the arrangement of work to ensure accurate collation, review, and evaluation of records directed toward achieving Clery Act compliance. The campus safety and emergency services section receives notice of all incidents at EOA University through the 24-hour dispatch center. The reports help to determine if there is a serious or continuing threat to the safety of the campus community that would require an alert such as a timely warning or emergency notification. All records of calls to the University emergency services unit are reported to the records office and processed within 24 hours.

The records office collates all incidents after completing forms and entering details into the database. The records are then examined and forwarded to the Associate Director for Clery, who filters for reportable crimes. The University records clerk and the Associate Director for Clery's compliance review all records to ensure they are not missing any of Clery's reportable crimes. The Department of Education has left the determination of crimes to the discretion of Clery officers (Department of Education, 2020). These are the two key individuals responsible for evaluating all incidents to determine crimes that will be reported in the Annual Security Report. The participants emphasized the work of the Clery Act committee in conjunction with the Associate Director of Clery compliance, who meets every month to evaluate records to ensure compliance with the Clery Act. Administrators at EOA University identified the need to engage a committee to ensure the proper implementation of the guidelines. The Clery Committee comprises representatives from key departments and various sections within

the institution who meet to discuss different issues to ensure that the University complies with the Clery Act guidelines.

From the interviews, the participants talked about the structure that was set up to ensure checks and balances to their practice to comply with the Clery Act and avoid consequences of non-compliance. According to Kezar (2001), implementing the change entails moving the institution from the current state of the organization into a new stage to create new structures. Internal audit reviews will help determine the adequacy and effectiveness of internal controls and adherence to applicable laws and regulations. EOA University has periodic internal audits and employs external auditors when they need to evaluate their practices to ensure that the institution maintains appropriate standards as required by the Clery Act. They make suggestions and identify areas for improvement to enable the institution to avoid liabilities. Clery officers at EOA University use internal audit reviews to determine the adequacy and effectiveness of their internal controls, adherence to applicable laws and regulations, and reliability of financial reporting. The institution has routine checks to ensure the procedures align with the Clery guidelines. EOA University also employs the services of external auditors to evaluate their internal procedures to ensure that the practices will enhance compliance with the Clery Act. According to Finch et al. (2012), there is a need for an appraisal stage after implementation that entails assessing the new practice and its effect on practice. Evaluating the practice helps the Clery administrators determine the new process's strengths and weaknesses. The auditors come with different perspectives and drill into every aspect of Clery Act procedures.

Promoting Clery buy-in awareness through educational programs is one method adopted by EOA University officials. They provide various educational awareness and prevention programs for the campus community. In addition, they employ proactive measures throughout the campus, promote safety awareness, and offer multiple training programs. The educational programs consist of primary prevention and awareness programs for all incoming students and new employees and ongoing awareness and prevention campaigns for all students and employees. Clery awareness is promoted by providing proactive training for students and employees and student support through programming.

The proactive training provided by EOA University, as per the Clery Act regulations, requires institutions to inform students of safety issues so that they can make informed decisions about protecting themselves (U.S. Department of Education, 2020). In addition, training keeps the campus community abreast of actions to take in dangerous situations and saves lives. EOA University has various training for the campus community, such as active shooter training. Students are taught procedures in case of an active shooter, with additional instructions on the website. Students and staff members are encouraged to call 911 if they encounter anyone in the building who is behaving in a way that seems suspicious.

The participants explained the various programs the Department of Public Safety offers to support students and promote a safe campus community as required by the Clery Act. Most programs are crime prevention, security awareness, and student support programs. EOA University offers awareness prevention programs for all incoming students and new employees, with ongoing awareness and prevention campaigns for all

students and employees. They present suicide prevention, alcohol and drug awareness, mental health, sexual health, and sexual violence programs. In addition to these programs, Public Safety sends periodic messages to promote safety awareness in compliance with the Clery Act guidelines (U.S. Department of Education, 2020). Students learn to be aware of their surroundings and be more security conscious within the campus community.

Answer to Research Questions

This section answers the research questions designed to thoroughly analyze the impact of the new Clery Act on higher education institutions. Cousin (2005) identified that research questions are the main points that guide the extent of the study. Therefore, the following questions guided this study.

1. How do campus security officers implement the new Clery Act guidelines in crime reporting?

The campus security officers at EOA University implement the new Clery Act guidelines in campus crime reporting by establishing a digitized central reporting system where daily records of all incidents through the University Police and Emergency Services and Campus Security Authority are collated by the University records office. In addition, several campus community departments report public safety incidents using the Maxient Reporting System. The new guidelines prompted a need to upgrade the online recording system at EOA University because the old system did not have the new classification of incidents. They determined the need for more effective means of recording and collating incidents. May and Finch (2009) identified collective action as

reshaping behavior or activities with a collective purpose to achieve a common goal. They identified the need to examine how the new policy interacts with existing practice. Clery Act administrators determine areas, policies, and procedures that need to change to conform with the new Clery Act requirements. EOA University collates and maintains all records of incidents on a shared network drive. The information is organized by the campus on which the incident occurred and broken down by each reportable crime.

In addition to the online record database, the University records office completes Clery cover sheets designed to conform with the new Clery guidelines. The Clery sheets are forms completed for each incident classified as a reportable crime. The documents are completed for filing and extra records purposes. The Clery cover sheet gives details of the incident, the type of incident, and the type of crime. The University records office has designed new Clery Act forms to conform with the new classification of crimes specified by the U.S. Department of Education. The cover sheet does not count off-campus incidents, thefts, simple assaults, and DWIs because these crimes are not on the list of mandatory crimes to report to the Department of Education. The university records had to modify their record-keeping procedures to comply with the new Clery Act guidelines. May and Finch (2009) identified the need to reshape actions and procedures with a collective purpose aimed at achieving a common goal. The new forms conform with the new classification of crimes specified by the Department of Education. They no longer had to count theft, robbery, and simple assault that occurred off-campus under the criminal offenses, hate crimes, and VAWA offenses. Also, Drinking While Intoxicated (DWI) that happened off the geographical area of the campus community is excluded from the statistics of liquor law, drug law, and weapons violations—instead, the forms

and database record incidents classified under the Clery Act. The Clery Act forms are stored in the records' storage and are never destroyed.

The campus security officers implement the new Clery Act guidelines by streamlining the number of Campus Security Authority (CSA) to those directly responsible for students' affairs. The new guidelines limit designated CSAs to those with significant responsibility for students and campus activities (U.S. Department of Education, 2020). The new regulations only include data within the geographical area used to support the institution's educational purposes. The Department of Education no longer applies specific measurements to geographical locations to include in Clery Act reporting (U.S. Department of Education, 2020). Clery officers implement the guidelines by building a coalition within and outside the institution to support the implementation. They work with representatives from various departments within the university and other entities outside the campus to create checks and balances to ensure compliance with the Clery Act. Internally, the Clery officers collaborate through a committee structure involving key representatives from various departments on campus and externally by maintaining a relationship with the local law enforcement agencies.

2. What are the reporting procedures in response to the new Clery Act guidelines?

The campus crime reporting procedures at EOA University created awareness of the need for the campus community to report criminal activity, emergencies, and public safety problems on each campus directly to Public Safety, 24 hours a day, by calling 911. As a result, the Department of Public Safety intensified its efforts to provide information about communications and basic safety procedures to use in an emergency threatening

public safety. The campus community should report emergencies immediately once they see them. When calling to report an incident, the caller will provide the location of the emergency and indicate where they are at EOA University. They will give a phone number, the nature of the emergency - medical, police, and the status of the emergency. If it is in progress or complete, they are to report if there is a need for medical or other assistance and any immediate threat to life. In addition, the caller will have to give a description, location or direction of travel of suspect(s), description of motor vehicle(s) involved, presence of weapons, and if there are any dangers to emergency responders. The caller must remain on the telephone until the dispatcher has disconnected. There are systematic procedures throughout the campus community to report incidents to public safety. The EOA University campuses have emergency phones placed strategically throughout the campuses. Callers can push the button for assistance, connecting them to the Department of Public Safety Communication Center.

The new reporting procedure introduced a digitized central reporting system for efficiency purposes. The revised electronic system is a shared database between the university records office and the office of Clery compliance. The record-keeping in response to the new Clery Act guidelines made collating and evaluating Clery statistics easier. In addition, the record-keeping process is now more detailed and has made it easier to filter data for Clery Act reportable crimes. The EOA university reporting system was designed to keep records of all incidents within the campus, not just the Clery Act crimes. It includes all incidents responded to by the campus police, reports by campus security officers, including all calls made to the call center, and all incidents reported to the various departments. The campus safety and emergency services section receives

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notice of all incidents at EOA University through the 24-hour dispatch center and the electronic system.

The records are analyzed to identify crimes specified as reportable in the Clery Act guidelines. Clery officers create a daily crime log and fire log from the records of all incidents reported to public safety. The Clery Act requires all higher education institutions to maintain a daily crime log and daily fire log (U.S. Department of Education, 2016). The daily crime log is a daily record of incidents that occur in the campus community. The daily crime log at EOA University gives information about the date and time the incident was reported, the date and time the incident occurred, the nature of the incident, the general location, and a disposition that describes the subject and action taken. The daily fire log also gives details of fire incidents within the campus community. The crime log includes the crime's classification, a case number, the date and time reported, the date and time when it occurred, the general location, and the disposition of the complaint if known (Clerycenter, 2020). The University makes the initial identification of Clery reportable crimes records staff member who completes a Clery cover sheet where details of the incidents are entered. Then, the University records clerk cross-references the form, forwards the forms, and notes it in the spreadsheet before forwarding it to the Associate Director for Clery compliance.

The Clery Act forms are sent to the Associate Director for confirmation and inclusion in the statistics of campus crimes reported in the Annual Security Report by the Department of Education. In addition to the Clery forms sent to the Office of Clery compliance, periodically, the Associate Director reviews all the documents. He compares them with the spreadsheet to ensure they get all the incidents to classify under the Clery

Act. The University records clerk and the Associate Director for Clery's compliance review all records and filters for Clery's reportable crimes. Higher education administrators must identify campus crimes specified in the Clery Act guidelines from the records of crimes reported to campus police, security personnel, and CSA officers. Higher education institutions are required to collect data on specified crimes that occur within the campus community. They must include four categories of crimes in their Annual Security Report (ASR). Criminal Offenses include Criminal homicide: murder and non-negligent manslaughter, manslaughter by negligence, Sexual assault as rape, fondling, incest, robbery, aggravated assault, burglary, motor vehicle theft, and arson. Hate Crimes include Larceny-theft, Simple Assault, Intimidation, damage, and vandalism of property. Violence Against Women Act offenses include domestic violence, dating violence, and Stalking. Furthermore, arrests and referrals for disciplinary action include weapons law violations, Drug abuse violations, and Liquor law violations. All the statistics collated are compiled and reported to the campus community through the Annual Security and Fire Safety Report published by the EOA Department of Public Safety. In addition, the Department of Public Safety at EOA University submits the annual crime statistics published in the Security Annual Report to the U.S. Department of Education.

3. What strategies do higher education institutions use to evaluate the implementation of the Clery Act guidelines?

EOA University has modified its record-keeping and reporting procedures to comply with the new Clery Act guidelines. A strategy used to evaluate the implementation of the Clery Act guidelines at EOA University is designating individuals

to assess practices. In addition, EOA University has constituted a Clery committee to evaluate performance and compliance with the Clery Act. The Clery committee at EOA University comprises a member from Admissions, Athletics, Community Standards, Facilities, Operations, legal affairs, Human Resources, Public Safety, Residential Learning, University Housing, Student Life, Student Equity and Compliance, and the Health Center. Most of the Clery committee members oversee individuals known as Campus Security Authorities. The committee is under the direction of the Associate Director for Clery compliance, who chairs the meetings. The Clery committee meets to discuss different issues to ensure that the University complies with the Clery Act and any revisions made.

May and Finch (2009) emphasized the need for reflexive monitoring and assessing a new procedure and its effect in practice. The goal of the Clery Committee is to ensure that they comply with the Clery Act and stay through it to do what is best for the university and the students. The committee meets every month to discuss different issues and ensures that the University complies with the Clery Act and any revisions to the policy. The Clery committee members are vigilant to ensure that the University abides by the law. Reflexive monitoring allows the evaluation of the advantages and disadvantages of the new process and the examination of its strengths and weaknesses (Finch et al., 2012). The agenda of the meetings focused on recent information about the Clery Act. Members are informed of incidents that have occurred in other higher education institutions. They review the incidents and learn things to do differently to prevent making the same mistakes. It is an opportunity to review current practices at EOA University and make recommendations for procedures to do differently.

Another strategy used to evaluate the implementation of the Clery Act guidelines is periodic audits to ensure compliance. Higher education institutions must take action to ensure compliance with policies, procedures, and legal obligations. EOA University has regular audits of its procedures and practices to ensure they comply with the Clery and avoid consequences of non-compliance. May et al. (2015) discussed communal appraisal, which involves individuals' formal collaboration to evaluate a practice's merits. EOA University has periodic internal audits and employs external auditors when assessing their practices to ensure that the institution maintains appropriate standards. According to May et al. (2015), there is a need to evaluate procedures to examine how the implementation of the new policy interacts with existing practices. EOA University has an internal audit department that performs audits by following the auditing standards of The Institute of Internal Auditors (IIA). The internal audit department provides an independent and objective service that will add value and improve operations through improved controls and efficiencies. They make suggestions and identify areas for improvement to enable the institution to avoid liabilities.

According to Finch et al. (2012), there is a need for an appraisal stage after implementation that entails assessing the new practice and its effect on practice. Evaluating the procedure will help determine the new process's strengths and weaknesses. Internal audit reviews will help determine the adequacy and efficiency of internal reviews, adherence to applicable laws and regulations, and the reliability of financial reporting. EOA University also employs the services of external auditors to ensure that they have practices that will enhance their compliance with the Clery Act. The auditors come with different perspectives and drill into every aspect of Clery Act

procedures. May and Finch (2009) said that working towards a common goal in this section may include resistance or reinvention to ensure compliance. However, it always involves making an effort around the practice. They give detailed reports of areas to update with recommendations and changes. The audits will help the University apply a systematic approach to evaluate the effectiveness of risk management, control, and governance processes. At EOA University, the regular use of internal auditors and the occasional service of external auditors as needed helps administrators redefine procedures or modify ways of doing things to ensure compliance with the Clery Act guidelines. The University also receives feedback from the campus community from students and staff to evaluate their practices and ensure compliance with the Clery Act. Audits are conducted internally and externally, with proactive measures taken to ensure that the institution complies with the requirements of the Clery Act. It helps administrators evaluate the effectiveness of their procedures and constantly seek new, more efficient ways to address campus safety.

Reflection on the Conceptual Framework

The study examined how campus security administrators implement the new Clery Act guidelines in campus crime reporting. The Normalization Process Theory was used to analyze the implementation of the new Clery Act guidelines in campus crime reporting. It provided a means to describe and understand social processes using new or changed practices of approaching and organizing work (May & Finch, 2009). In addition, it is a theory of implementation that encourages considering issues around practices in a social organization (implementation), establishing practices in routine (embedding), and sustaining practices in an organization (integration) (May & Finch, 2009). The theory

proposes that material methods become routine as people work individually and collectively to implement the practices within a social context. The implementation process involves the organization of individuals interacting within a specific context over a given period, focusing on what people do and how they work. The Clery Act implementation was examined through coherence, cognitive participation, collective action, and reflexive monitoring (May & Finch, 2009). These components were discussed in more detail in relation to implementing the Clery Act guidelines at EOA University. Therefore, it went further than the general overview given in Chapter 2.

Coherence

This first component of the theory proposes that establishing a new set of practices depends on work that defines and organizes the practice. Coherence is a practice that organizes actions based on the meaning, uses, and social definitions of those who enact the practice. It is the planning stage where institutions must understand how to implement a policy. Administrators have relied on the Clery Act handbook guidance since 2005 but must determine appropriate steps to adapt to the new guidelines in the Appendix (Kent, 2020). The sense-making process involves understanding what organizations must do to promote a practice (Finch, Mair, et al., 2012). For example, EOA University officers enforced their record-keeping systems under the new Clery Act guidelines. They modified forms and adapted an online database system for record keeping. Clery officers at EOA saw the need to alter some practices to ensure compliance with the new guidelines. Sense-making entails making sense of a new policy and changing practices based on the meaning created by participants (Finch, 2012).

Coherence was explained using differentiation, communal specification, individual specification, and internalization.

The first mechanism of coherence is differentiation. Sense-making requires understanding how practices differ (May et al., 2015). This section examined how administrators make sense of the new Clery Act guidelines as they vary from previous guidelines. The communal specification of sense-making depends on individuals working together to build a shared understanding of objectives (May et al., 2015). This section evaluated how administrators constantly communicated, ensuring a shared understanding of the Clery Act guidelines. Individual specification is sense-making that requires individuals to do what will help them understand specific tasks for a set of practices (May et al., 2015). It focused on how Clery Act officials describe their role in implementing the new guidelines by collaborating with various departments in the campus community. Internalization is sense-making that expects people to know the value of a set of practices (May et al., 2015). This section's last segment helped realize the added value of the new Clery Act guidelines to campus crime reporting.

Cognitive Participation

The cognitive participation mechanism is purposive interaction chains that comprise an implementation process. According to May and Finch (2009), cognitive participation is the stage where institutions work out participation to implement a new practice. For example, administrators at EOA University engaged individuals to carry out the new Clery Act guidelines. This process entails institutions enrolling participants to practice the new policy (Finch et al., 2012). It involves building a solid motivation to

seek the buy-in and cooperation needed to effect meaningful change (Hussain et al., 2016). The Clery Act officers at EOA University identified the need for collaboration, so they designated individuals in critical positions from various departments to the Clery committee. They ensured human engagement with long interaction by coordinating tasks among individuals to evaluate and cross-reference records for Clery Act purposes. Cognitive participation was explained using initiation, legitimation, enrolment, and activation.

The first mechanism of cognitive participation is initiation. It involves participants' need to work to support a new or modified set of practices (May et al., 2015). This section examined how the participants adapted new procedures to implement the new Clery Act guidelines. Legitimation describes that participants have to believe in their involvement to make a valid contribution to a practice (May et al., 2015). This section examined how participants are engaged and organized in implementing the new Clery Act guidelines. Enrolment involves participants organizing themselves to ensure collaborative contribution to a set of practices (May et al., 2015). This study analyzed how various departments collaborate with others to implement the Clery Act guidelines through their representative in the Clery committee. The last segment of cognitive participation is activation, which states that participants must collaborate to identify the process required to sustain a practice (May et al., 2015). It examined necessary actions to ensure compliance with the new Clery Act guidelines through periodic evaluation of its methods.

Collective Action

Collective action is the series of interactions where the cognitive participation of individuals is traced. It involves understanding the mental and material work of organizing and enacting a practice (May & Finch, 2009). The work in this segment concerned reshaping behavior or actions with a collective purposive action aimed at achieving a common goal. Clery Act administrators must determine areas, policies, and procedures that need to change to conform with the new Clery Act requirements. Under the new guidelines, EOA University officials determine campus crimes to report, individuals to designate as mandatory reporters of crimes, and areas to collect crime data. Collective action is the stage where institutions have to carry out the new practice with the support of the participants (Finch et al., 2012). Working towards a common goal in this section may include resistance or reinvention to ensure compliance, but it always involves making an effort around the practice (May & Finch, 2009). Implementing the change entails moving the institution from the organization's current state into a new stage to create new structures (Kezar, 2001). The office of Clery compliance at EOA University keeps most of its procedures with slight modifications in line with the new guidelines. References are made to the Clery Act handbook, whereas the Appendix leaves the definition of campus crimes to the institution's discretion. Collective action was explained using interactional workability, relational integration, contextual integration, and set skill workability.

The first mechanism of collective action was interactional workability, which describes work people and other sets of practices in an everyday setting (May et al., 2015). This section explored how administrators work together to implement the new

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Clery Act guidelines. Relational integration involves work that people do to build

accountability and maintain confidence in a set of practices in each other as they use

them (May et al., 2015). The third component of contextual integration involves

managing practices by allocating resources and executing policies and procedures (May

& Finch, 2009). This section examined the resources provided at EOA University to

promote campus safety and ensure compliance with the Clery Act. Finally, Skillset

workability establishes the division of labor built around executing a set of practices

(May & Finch, 2009). The procedure evaluated how tasks are divided for collecting and

collating information for the Annual Security Report required by the Clery Act

guidelines.

Reflexive Monitoring

The reflexive monitoring is the appraisal stage, where the new practice and its

effect on the practice are assessed. The advantages and disadvantages of the new process

are examined to evaluate its strengths and weaknesses (Finch et al., 2012). EOA

University has periodic audits to ensure compliance with the Clery Act. The Clery

committee meets every month to evaluate its practices and procedures. External auditors

are invited to review procedures and make recommendations for best practices if

necessary. Monitoring work patterns is based on the normative elements of

implementation. It focuses on how things should be instead of how things work out in

practice. How things are done depends on work that defines and organizes the

understanding of the practice (May & Finch, 2009). Reflective monitoring was explained

using systematization, individual appraisal, communal appraisal, and reconfiguration.

The first mechanism of reflective monitoring is systematization, which involves collecting information using various methods (May et al., 2015). This section examined how all incidents are reported and filtered for Clery Act purposes. Individual appraisal has to do with how participants evaluate the effect of a new set of practices on them (May et al., 2015). The Associate Director for Clery compliance at EOA University evaluates their practices and is open to implementing recommendations from the Clery Committee. Communal appraisal involves a formal collaboration of individuals to analyze the set merits of their practices (May et al., 2015). The Clery committee evaluates the procedures to ensure they are effective and constantly seeks new, more efficient ways to address campus safety. As a result, they are prone to adopt new policies, procedures, and practices. The last mechanism of reflective monitoring is reconfiguration, which is an appraisal to redefine procedures, modify practices, or change ways of doing things (May. et al., 2015). This segment examined how administrators make changes to their procedures in line with the new Clery Act guidelines. When an institution has made changes and adopted the new ways of working, then the institution will identify what supports the changes made to Clery Act reporting procedures, identify barriers to sustaining changes made, and develop ways to sustain the change.

The theory proposes that material methods become routine as people work individually and collectively to implement the practices within a social context. The implementation of the new Clery guidelines was examined through coherence, cognitive participation, collective action, and reflexive monitoring. The implementation process involves the organization of individuals interacting within a specific context over a given

period, focusing on what people do and how they work (May & Finch, 2009). The findings of this study had implications for policy, practice, leadership, and research.

Implications for Policy, Practice, Leadership, and Research

Policy

The findings from this study indicated that campus security officers at EOA University modified its policies to ensure compliance with the new Clery Act guidelines. The Public Safety Office of Clery compliance established a system for record-keeping to ensure that all incidents are accurately recorded and analyzed for Clery purposes. Campus security officers should continue with policies to promote accurate reporting of all incidents. They have to implement policies to encourage communication with the CSAs beyond just designating the individuals as mandatory reporters of crime. Higher education institutions should maintain accommodating policies to encourage victims to report crimes. Some participants indicated the reluctance of victims to make a formal report, especially in cases of sexual assaults.

The U.S. Department of Education needs to support higher education institutions because the new Clery Act guidelines in the Appendix, whose intent was to clarify existing requirements, provide little substance beyond the information in the regulations. The recent changes to the Clery Act requirement permit higher education institutions to use their discretion regarding compliance (Murakami, 2020). Higher education institutions must determine and justify crime statistics for locations reported in the Clery Act. The recent changes state that the Department of Education expects higher education institutions to use reasonable interpretations to explain terms in the Clery Act reports

(Carter, 2020). The Clery Act handbook is still available for reference on the Department of Education website. Clery Act officers still refer to the handbook, primarily where it provides examples of situations similar to circumstances at their institutions (Tulloch, 2020). The recent changes that give little guidance to institutions have left more questions than answers for institutions. There have been concerns from advocates that data quality will be reduced as institutions will be using various definitions (Murakami, 2020). Higher education institutions still risk losing federal funding for failure to adapt to the Clery Act requirements (U.S. Department of Education, 2016). Besides, the financial burden due to violations of the Clery Act is high, and a single violation costs $58,328 (Clery Center, 2020). The Department of Education should support higher education institutions because the review of the Clery Act guidelines in the Appendix does not eliminate non-compliance penalties.

Practice

This study's findings describe various programs offered to the campus community at EOA University in compliance with the Clery Act. These programs could be improved by connecting the initiatives to some other New Jersey State institutions to share best practices and imbibe procedures that will promote campus safety. EOA University offers educational and awareness prevention programs for all incoming students and new employees with ongoing awareness and prevention campaigns for all students and employees. Most of the programs provided at EOA University are done in collaboration with various departments on campus. However, these programs may benefit more from working with other New Jersey State institutions. As they collaborate and connect, it allows for building relationships where they can share ideas and work to ensure

compliance with the Clery Act. The U.S. Department of Education can offer incentives to strengthen Clery Act programs and collaboration among institutions.

Campus security officers should constantly review their procedures to make reporting incidents easier and promote accurate crime reporting. They may consider revising current policies or establishing new procedures to make reporting incidents easier. For example, identifying Clery Act reportable crimes can be more straightforward using a program to help filter campus crimes specified in the guidelines. The current practice involves completing Clery cover forms for each Clery Act crime identified before entering the information in the new online system. The procedure for collating campus incidents can be entirely online for easier recording and evaluation. The revised procedures should focus on measures to reduce crimes and promote a safe campus community. Higher education institutions should allocate more resources for campus safety initiatives, like sending periodic flyers and emails to the students and staff emphasizing safety procedures in an emergency.

Leadership

Implementing the Clery guidelines using the Normalization Process Theory has implications for leadership. Implementing the new Clery guidelines at EOA University shows the need for a systematic approach to implementing a new practice. The Clery administrators made sense of the new policy and identified procedures required to achieve the goals. The leadership had to create means to attain set goals, which shows the need for effective leadership that intentionally implements change to meet stipulated standards (Northouse, 2015).

The office of Clery Compliance works with representatives from various departments to implement the Clery Act guidelines. They organize their activities to ensure the collaborative contributions of several departments within the institution. Good leadership identifies the need to work out the participation of others to support a new or modified set of practices. They work with others to build accountability and maintain confidence in the work of others. The Clery administrators collect and collate crime statistics using various departments within the university, which shows that in leadership, there is a need for work that establishes the division of labor built around the execution of a task. This study indicates that authentic leaders make sense of work and create a deep sense of purpose to get tasks done. They communicate and work with others to achieve set goals. This study has implications for further research because just one implementation theory was used to examine implementing the new Clery guidelines.

Research

The Normalization Process Theory was used to examine the implementation of the new Clery Act guidelines by higher education institutions. This theory helped to describe and understand the processes using changes in practices and approaches to organizing work. The implementation of the Clery Act guidelines was considered around practices in a social organization (implementation), establishing practices in routine (embedding), and sustaining practices in an organization (integration) (May & Finch, 2009). It was examined through four components: coherence, cognitive participation, collective action, and reflexive monitoring. It is essential to discuss the implementation of the Clery Act using other implementation theories or frameworks to analyze the implementation of the Clery Act guidelines from different angles.

Various implementation theories can be used to evaluate the implementation of the new Clery Act guidelines, such as Process models, Determinant frameworks, Classic theories, Implementation theories, and Evaluation frameworks. These implementation theories have been designed to provide a better understanding and explanation of the different areas of implementation. For example, Mazmanian and Sabatier (1991) describe various stages of policy implementation. Therefore, analyzing the procedures for Clery Act implementation using other implementation theories may provide additional information that may contribute to compliance with the Clery Act guidelines.

Recommendations

This study fills a gap in the field of Clery Act implementation in response to the new Clery Act guidelines, as not much is known about the response of higher education institutions. It was a case study of implementing the new Clery Act guidelines at EOA University, a four-year university in New Jersey. EOA University is a Carnegie-classified national doctoral research institution. Further research will be required to conduct multiple case studies involving other post-secondary institutions, like surrounding colleges and universities. Additional studies can be done to compare the implementation of the Clery Act among states on the East Coast compared to other regions of the country to examine if there are similar responses among institutions. It will allow for comparison and a good exploration of the Clery Act implementation strategies and protocols.

It is recommended that additional training can be offered to the campus community. Some of the training is for new students and employees. Online training is required of all first-year students at EOA campuses. However, every member of EOA

University has the right to access and benefit from the educational programs, activities, and services of the University free from any form of sexual violence, harassment, or exploitation. There should be refresher training courses for students and staff members. Though the training is ongoing throughout the year, more students can be encouraged to attend. The Department of Public Safety can ensure that the training is publicized to the campus community and promote the participation of both students and staff.

There is a need for further study to research challenges experienced by campus security officers in their efforts to ensure compliance with the Clery Act guidelines. This study explains how the new Clery Act guidelines are implemented in campus crime reporting. Therefore, it is imperative to research difficulties or issues with implementing the new policies in the long term. In addition, campus security administrators need to work with the U.S. Department of Education to facilitate better understanding and promote compliance with the Clery Act guidelines. Although there is no doubt the Clery Act is bringing attention to the issue of campus safety, it takes continuous efforts from all stakeholders to ensure compliance.

Conclusion

This chapter discusses the findings and conclusions of the study on implementing the new Clery Act guidelines at EOA University. It explained the answers to the challenge questions to help insight into implementing the new policy. The Normalization Process Theory helped to evaluate the implementation of the Clery Act, considering issues around practices in a social organization (implementation), establishing practices in routine (embedding), and sustaining practices in an organization (integration) (May &

Finch, 2009). The theory proposes that material methods become routine as people work individually and collectively to implement the practices within a social context. According to May and Finch (2009), the implementation process involves the organization of individuals interacting within a specific context over a given period, focusing on what people do and how they work. This chapter explained the implications for policy, practice, and research. It concludes with practice recommendations. No doubt, the new Clery Act guidelines prompted modifications to procedures for collating campus crime data. This study provides an example of how the guidelines are implemented by serving as a model for other institutions and a reference for Clery Act officers.

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