

# REPORTING CRIME ON OHIO'S PUBLIC CAMPUSES



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## SPECIAL REPORT

# A message from the Auditor



Sending a child off to college is a momentous event for every family that does it. For parents, it can be a moment of pride yet worry, as they watch a son or daughter venture off on this first major step of adulthood.

Besides concerns about the challenges and stresses their child will experience in this new academic environment, parents also worry about their child's security, especially if their son or daughter is attending a distant campus. Parents want to know that the university or college is a safe place.

It was this concern that was the impetus for the Clery Act, the federal law that requires universities and colleges to publicly report crime statistics and to detail their procedures to respond effectively to campus emergencies.

By Oct. 1 each year, universities that receive federal funding must report their crime statistics for the previous three years. Parents can use these reports to gauge the safety of their child's college or university. Often these reports are closely scrutinized by news media to determine if they provide an accurate assessment.

Though the Clery Act is a federal law and compliance and enforcement are the responsibility of the U.S. Department of Education, the Auditor of State's office is concerned about the resources, training and support available to higher education institutions to meet Clery obligations.

This report looks at the challenges facing Ohio's public institutions of higher learning in fulfilling their responsibilities under the Clery Act. It is not an audit. Our office examined Clery Act requirements and performed limited testing of Ohio's 37 public campuses to see if they are meeting basic reporting requirements, such as filing the annual security reports required by the law. All 37 completed their October 2017 reports as required.

After gauging the current Clery Act activity on campuses and the support provided by the state of Ohio, the Auditor of State's Office surveyed Ohio's public colleges and universities about their compliance efforts.

Our survey showed that regardless of the size of the institution, there are difficulties in complying with the law. Larger institutions have a significantly larger reporting challenge, while smaller institutions have fewer resources to devote to Clery reporting. These challenges raise concerns about the ability of public colleges and universities to report their crime statistics accurately and comply with the other requirements of the Clery Act.

The results of this survey are presented here, along with our office's recommendations for addressing the issues raised.

A handwritten signature in blue ink that reads "Dave Yost".

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# THE CLERY ACT

## Executive Summary

On Oct. 1 each year, Ohio's 37 public universities and colleges are required by the federal Clery Act to report their campus crime statistics for the previous three years, as well as detail their emergency notification systems and other matters involving campus safety. The aim is to help parents and students assess security at these institutions.

Clery Act compliance is a weighty responsibility, especially considering that each violation of reporting requirements could result in a fine of nearly \$55,000 imposed by the U.S. Department of Education (USDOE), which oversees compliance.

As a result of a number of amendments to the law, reporting requirements have become more extensive. The complexity of the law is evident in the size of the handbook created by the USDOE to help higher-education officials comply. At 265 pages, "[The Handbook for Campus Safety and Security Reporting](#)" is not easily digested, and while it strives to offer examples of how to identify, classify and report a variety of crimes and student discipline cases, it is inevitable that there will be ambiguities and unanswered questions.

### **Among other things, the Clery Act requires higher-education institutions to:**

- Publish an annual security report, including campus crime statistics.
- Submit crime statistics to the USDOE.
- Issue campus alerts about continuing threats or emergency situations.
- Provide educational campaigns about dating violence, domestic violence, stalking and sexual assault.
- Compile a daily crime log (only for institutions that have a campus security/police department).

To get a better understanding of the challenges involved in Clery compliance, the Auditor of State's office (AOS) conducted a 48-question survey of Ohio's public higher-education institutions, asking them about the resources, time and expense they devote to Clery compliance, as well as the problems they face and assistance needed.

Whether it's a large, metropolitan university or a small-town community college, many reported challenges. Small colleges report that they are stretched to provide the staff and money to support compliance activities, including paying for Clery training. Large universities – especially those whose programming involves significant student travel – can face daunting amounts of paperwork and research to fulfill Clery requirements.

### **Respondents reported a number of issues that make Clery compliance challenging. These include:**

- Lack of time, money and staff to collect data and prepare Clery reports.
- The lack of resources for Clery training.
- Difficulties reconciling state crime definitions with the definitions in the Clery Act.
- Uncertainty about how some crimes should be classified and reported.
- Difficulties seeking crime reports from some off-campus, non-university law enforcement agencies in places where students travel for university-related activities.
- Keeping up with changes in the law.
- Identifying who on campus should be included as a "campus security authority." Campus security authorities are employees who have direct involvement in student activities and are in a position to receive information about and report incidents covered by the Clery Act.

Based on these responses, AOS created recommendations for the consideration of state officials and legislators. These recommendations can be found on Pg. 17, but are briefly summarized here.

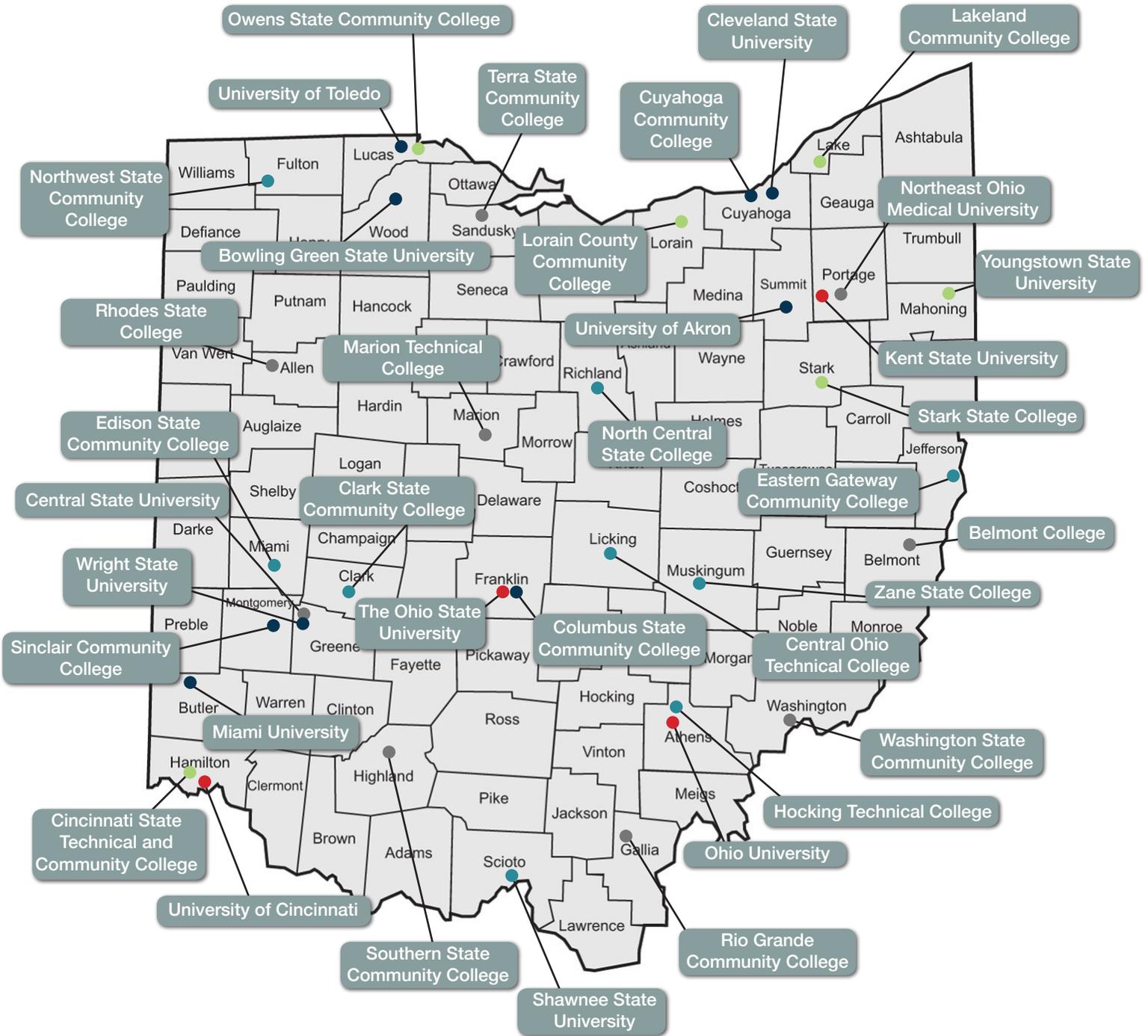
### **AOS recommends that Ohio:**

- Provide convenient and affordable Clery Act compliance training for colleges and universities across the state.
- Create a Clery Act resource center to provide assistance and support to higher education institutions, with a focus on quickly resolving questions about compliance. The center could include an online platform where university and college Clery compliance staff could collaborate and support one another.
- Collect and analyze Clery reports to identify crime trends, compare them to trends in other states and propose ways to reduce campus crime.
- Require — and provide resources to allow — schools to post their daily crime reports online, along with maps showing the location and details of Clery-reportable crimes.

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## Participating Ohio Public Colleges and Universities

To see an interactive version of this map, go to [www.ohioauditor.gov/publications/clery/ohioinstitutions.html](http://www.ohioauditor.gov/publications/clery/ohioinstitutions.html)



### Population key

- More than 30,000
- 16,001-30,000
- 7,001-16,000
- 3,001-7,000
- Less than 3,000



123rf.com

## How the survey was conducted

**T**he survey seeks to assess current Clery Act reporting activities at public colleges and universities, identify challenges Ohio colleges and universities face in complying with the Clery Act, and provide recommendations to Ohio officials and legislators for support, policy and legislative improvements to help higher-education authorities comply with the Clery Act.

This report focuses on the 2017 annual security reports filed by Ohio's 37 public colleges and universities, which contain crime data from 2014, 2015 and 2016. The survey was administered to all of these institutions.

This report is not a financial or performance audit. Therefore, it is not within the scope of this work to conduct a comprehensive and detailed examination of all aspects of the Clery Act and compliance by Ohio's colleges and universities. Certain information included in this report was derived from annual security reports and survey responses whose accuracy was not independently confirmed by the Auditor of State.

AOS staff began with a review of federal Clery Act requirements and assessed Clery Act reports and statistics that are published by Ohio's public colleges and universities.

Based on these reviews, a survey of 48 questions was created and emailed to each of Ohio's 14 public universities and 23 community colleges via SurveyMonkey, the online survey service.

All 37 institutions responded.

### **WHAT THEY SAID**

A sampling of survey comments

**"I believe that it would be beneficial to have a group or organization of Clery Compliance Officers in the state of Ohio so that there can be more collaboration between institutions in our state."**

## What is the Clery Act?

The “Jeanne Clery Disclosure of Campus Security Policy and Campus Crimes Statistics Act” is a federal law requiring all higher-education institutions that accept federal student financial aid to report campus crime statistics and security information by October 1 of each year.

It is named after Jeanne Clery, who was raped and murdered in her Lehigh University dorm room in 1986. Believing that their daughter’s death was the result of poor campus

security and a lack of information about campus crime, her parents launched a campaign to require universities to report crime statistics.

The original law, called the “Crime Awareness and Campus Security Act” was passed in 1990. It has been amended several times since then, including the 1998 title change to memorialize

### WHAT THEY SAID

A sampling of survey comments

**“While we are confident in our processes and the time we devote to campus safety, we recognize there is always more we could do.”**

Jeanne Clery.

In 2013, the “Violence Against Women Act” further expanded Clery Act reporting to require universities to compile statistics about dating violence, domestic violence, sexual assault and stalking.

Among other things, the Clery Act requires higher-education institutions to:

- Collect and publish campus crime statistics.
- Publish an annual security report.



Photo courtesy The Clery Center

### JEANNE CLERY

- Issue campus alerts about continuing threats or emergency situations.
- Provide educational campaigns about dating violence, domestic violence, stalking and sexual assault, and detail the disciplinary procedures for these violations.
- Submit crime statistics to the USDOE.
- Compile a daily crime log (only for institutions that have a campus security/police department).

The USDOE publishes a 265-page guide titled “The Handbook for Campus Safety and Security Reporting,” usually referred to as the “Clery handbook,” to educate school officials in Clery Act compliance. Some universities also seek guidance from professional Clery compliance consultants.

Failure to comply with the Clery Act can result in fines of \$54,789 per violation. The single largest Clery Act penalty was \$2.39 million, imposed on Pennsylvania State University in 2016 by USDOE for violations that came to light in connection with the child sexual abuse case against assistant football coach Jerry Sandusky.

# Survey Overview

## Clery compliance personnel

Ohio's institutions of higher education are diverse in size, location and circumstances, ranging from huge urban campuses to those in small towns in rural counties. The range of enrollments gives an idea of this diversity, with the largest survey respondent reporting an enrollment of 59,837, which is nearly 80 times larger than the smallest, with reported enrollment of 752 students.

How each institution handles Clery compliance also varies widely, with Clery duties assigned to a wide range of university officers. In cases of schools with their own campus security/police departments, the head of security or the police chief often is primarily responsible for compiling crime statistics and other Clery information. Some schools had staffers specifically delegated to Clery reporting. Other campus employees who were tapped for this duty included vice presidents of various divisions, human resources personnel and student affairs executives.

The chart at right details the experience of those charged with Clery Act compliance.

The percentage of time respondents spent strictly on Clery compliance varied widely, too, with one reporting that Clery compliance took up about 2 percent of annual work hours, while four institutions reported having a full-time Clery compliance staff position.

## Issues in Clery compliance

Respondents reported a number of issues that make Clery compliance challenging.

These included:

- Difficulties reconciling state crime definitions with the definitions in the Clery Act.
- Uncertainty about how some crimes should be classified and reported.
- Difficulties seeking crime reports from off-campus, non-university law enforcement agencies. One respondent noted that the institution had to reach out to approximately 500 out-of-county, out-of-state and international law-enforcement agencies to meet Clery reporting mandates.
- Lack of time, money and staff to collect data

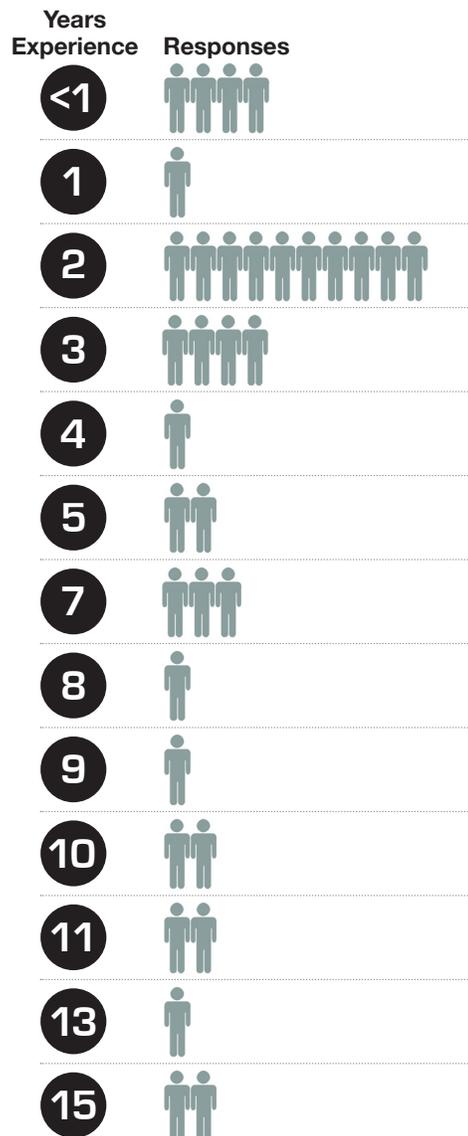
## WHAT THEY SAID

A sampling of survey comments

**“Due to budget constraints, we do not have a full-time Clery coordinator, which would be optimal.”**

## Clery reporting experience

Experience with Clery compliance ranged widely in survey responses, from one who reported just three months experience to a couple who reported 15 years. The vast majority have two or more years experience. Here's the breakdown\*:



\* Three institutions did not answer this question.

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and prepare Clery reports.

- Keeping up with changes in the law.
- The lack of resources for Clery training.
- Identifying who on campus should be included as a “campus security authority.”

## Time and Money

The amount of time and money spent complying with the Clery Act varies widely among the institutions, depending in large part on the size of the institution.

Eight schools (21.6 percent) reported spending up to 25 hours to compile the annual report. Eleven institutions (29.7 percent) said the project required between 26 and 50 hours. Three (8 percent) said the job consumed 51 to 75 hours, 3 (8 percent) reported 76 to 100 hours, and 12 (32.4 percent) said compliance required more than 100 hours.

The cost of preparing the reports also varied widely, though almost 56 percent of schools (20 of the 36 that responded to the question) said the cost was less than \$25,000. Four (11 percent) reported spending between \$25,000 and \$50,000, while two (5.5 percent) reported costs between \$51,000 and \$75,000. Two reported costs between \$76,000 and \$100,000. Eight schools (22 percent) reported spending more than \$100,000 on report preparation.

## Compiling data

Gathering the information necessary for Clery reports is not easy, say a majority of the survey respondents. Twenty-two schools (59 percent) ranked information gathering as “somewhat difficult,” two (5 percent) ranked it “difficult” and three (8 percent) characterized it as “very difficult.”

Only nine schools (24 percent) said the information gathering was easy, and only one labeled it “very easy.”

## WHAT THEY SAID

A sampling of survey comments

**“The complexity and cost of Clery compliance is a burden on the institution, and our current resources are strained.”**

## Adequate Resources

Asked if their institution devoted enough resources to Clery compliance, 12 of 37 respondents (32.4 percent) strongly agreed. Fourteen (37.8 percent) said they “somewhat agreed,” while 10 (27 percent) said they “neither agree nor disagree.” One respondent indicated “somewhat disagree.”

The additional comments provided by respondents indicate concerns about a shortage of staff, the complexity of the Act, the need for more training and fears of the penalties that institutions could face if their reporting is flawed.

Comments included:

- “The ability to adequately devote resources often depends upon the ebbs and flows of staffing levels.”
- “Due to budget constraints, we do not have a fulltime Clery coordinator, which would be optimal.”
- “The complexity and cost of Clery compliance is a burden on the institution, and our current resources are strained.”
- “One never knows if it is enough based on the clarity of the Clery manual or outside trainers’ opinions.”

## Scope of crime reporting

The Clery Act requires colleges and universities to report statistics for crimes that occur on campus, on public property within or immediately adjacent to the campus and on non-campus property that the institution owns or controls.

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Thirty-one institutions, or almost 84 percent, recorded crimes only for the areas specified by the Clery Act. But six institutions reported crime statistics for areas that fall outside the areas required by the Act.

## Cooperation of neighboring law-enforcement agencies

Sometimes, universities must seek crime statistics from non-university law-enforcement agencies, for example, when a university does not have a campus police department of its own and relies on a local law-enforcement agency for police services. Some must collect crime statistics from foreign law-enforcement agencies for the university's foreign branches or study abroad programs.

Even institutions that have a campus police department might have to seek crime statistics from a neighboring police agency, because the Clery Act requires universities to report crimes that are committed on non-university property that is immediately adjacent to and accessible from university property.

The Clery Act includes no mandate that neighboring police agencies cooperate, so it merely requires that universities make a good-faith effort by requesting the cooperation of law-enforcement neighbors.

Nineteen of the 37 institutions (51 percent) reported that they strongly agree that neighboring police agencies are cooperative in providing crime statistics from their jurisdiction. Another 13 institutions (35 percent) reported that they "somewhat agree" that neighboring jurisdictions are cooperative.

Two institutions (5 percent) said they "somewhat disagree" that the neighbors are cooperative, and two others (5 percent) "strongly disagree" that cooperation is forthcoming. One said the question wasn't applicable.

Sometimes, the Clery mandate to seek statistics from non-university sources is a burden whether outside agencies cooperate or not. One institution included among its Clery challenges the need to send out 500 letters to national and international law-enforcement agencies in an attempt to collect crime statistics for university study-abroad programs and other student travel. Another institution echoed this, reporting, "The biggest challenge would be ensuring we are requesting crime statistics from all non-campus locations, including short stay-away trips and international study."

## Compliance training and advice

The survey asked respondents how those in charge of Clery compliance learned to do the job. The top answer, provided by 36 of 37 institutions (97 percent), was the Clery handbook. Thirty respondents (81 percent) cited formal training, and 29 (78 percent) listed "self-education and seeking advice from others."

Sixteen (43 percent) cited experience in law enforcement and 12 respondents (32 percent) said they formerly had served in a subordinate capacity to someone knowledgeable in Clery compliance. One respondent cited guidance from the university's compliance office, while another said expertise was gained by reading previous Clery audits conducted by the U.S. Department of Education. Other sources of Clery education were conference training, webinars and articles shared among those responsible for Clery compliance.

Only three institutions said they used the services of a professional Clery consultant, and all three cited D. Stafford & Associates, a consulting firm based in the state of Delaware which specializes in campus safety and security, including independent audits of Clery compliance. One respondent

## WHAT THEY SAID

A sampling of survey comments

**"The biggest challenge would be ensuring we are requesting crime statistics from all non-campus locations, including short stay-away trips and international study."**

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## WHAT THEY SAID

A sampling of survey comments

**“Yes, it is challenging to translate Ohio law for Clery reporting. For example, burglary, arson, and dating violence are not completely compatible and officers are confused as to which standard to apply when evaluating for Clery reporting.”**

said the institution paid \$500 annually for the consultant’s services. Another reported the cost as \$700 annually.

D. Stafford and Associates also lists itself as a sponsor for the NACCOP Clery Compliance Officer Certification Program, which is offered by the National Association of Clery Compliance Officers and Professionals. The NACCOP shares the same Delaware address as D. Stafford and Associates.

## Campus Security Authorities

The Clery Act identifies a broad swath of campus personnel as campus security authorities (CSAs), and it is up to each institution to determine who on campus falls into this category.

The Clery handbook notes, “Because official responsibilities and job titles vary significantly on campuses, we are not providing a list of specific job titles. To determine specifically which individuals or organizations are campus security authorities for your institution, consider the function of that individual or office” and “If someone has significant respon-

sibility for student and campus activities, he or she is a campus security authority.”

Examples of those in this category include top school administrators, campus police officers, the head of a campus health center, an institution’s athletic director or a student assigned to monitor access to a dormitory.

Examples of those who would not be considered CSAs are faculty who have no responsibility for campus activities outside the classroom, as well as clerical and cafeteria staff.

All CSAs are required to report any allegation of a Clery Act offense that is brought to their attention while in performance of the duties that qualify them as a CSA, regardless of whether the allegation is investigated or substantiated. These CSA reports are to be incorporated into the institution’s campus crime statistics.

Asked to identify who on their campuses are considered CSAs, survey respondents listed more than 20 categories of people by title or function.

Thirty-three respondents (89 percent) reported that they provide training for their CSAs, while four said they do not.

Those who say they train their CSAs listed a number of methods. These included in-person classes, videos, online seminars and videos, instruction from consultants, and written instructions provided via email or in print.

## Who is a Campus Security Authority?

Survey respondents listed the following people on their campuses whom they consider CSAs:

CSA	% OF RESPONDENTS
Vice President of Student Affairs	70.3
Student Housing officials	54.0
Student Conduct Affairs & Discipline	78.4
Athletic director and team coaches	59.5
Faculty/staff advisor to student group	64.8
Student health center director	37.8
Transportation Services	18.9
Military Services	21.6
Student activity advisors	59.5
Residence advisors/assistants/desk attendants	43.2
Academic advisors	43.2
Pastoral counselor	2.7
Peer mentors	8.1
Student patrol	18.9
Event security	29.7
Administrators of branch/satellite campuses	56.7
International student office staff	40.5
Faculty/staff on international travel	35.1
Other	48.6

Note: Not all positions exist at every institution.

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## Finding answers to compliance questions

When questions arise about how to report a crime or other event under the Clery Act, 36 of 37 respondents (97 percent) reported that they turn to the Clery handbook for answers. Twelve (32 percent) said they used their institution's in-house counsel. Thirteen (35 percent) reported that they consult with the U.S. Department of Education: eight via email and 5 with phone calls. Three said they turn to the Ohio Department of Higher Education.

Fourteen (38 percent) also reported that they used a variety of other sources including the Ohio Attorney General's office, guidance from their institution's compliance office, consultants, and peers at other educational institutions.

## Adequacy of the Clery Handbook

A majority of respondents (29 of 37, or 78 percent) rated the handbook as

good to excellent, while five (14 percent) found it aver-

age, two rated it as poor and one was unfamiliar with the handbook.

But despite majority approval, respondents said there were a number of sections of the handbook that could be improved. These are some of the shortcomings identified:

- More clarity needed in the sections covering crime reporting for short-term trips within and outside the country.
- Clearer guidance needed on complying with the provisions of the Violence Against Women Act.
- Better definitions of non-campus buildings and other property would be helpful.
- The Clery handbook's examples of what does and doesn't count as a Clery-reportable crime are sometimes ambiguous and difficult to apply.
- The Clery definition of burglary does not match the Ohio law-enforcement definition.
- Better guidance is needed on which campus personnel should be designated as "campus security authorities."

## Confidence levels

Respondents were asked to rate their level of confidence that campus officials have a full understanding of the Clery Act on a scale of 1 to 5, with 5 representing complete confidence.

A majority – 25 of 37 or 68 percent – indicated a high degree of confidence, with five (14 percent) rating their confidence level at 5, and 20 (54 percent) rating it at 4. But a significant

## WHAT THEY SAID

A sampling of survey comments

**“Most campus officials have a very good understanding, but Clery is complicated and ever-changing. We are working on having that knowledge trickle down to other appropriate staff.”**

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minority – 13 respondents or 35 percent – rated their confidence level at 3 or less, including 11 whose confidence was rated at 3, one rated at 2 and one rated at 1.

Respondents said uncertainties resulted from: 1) gray areas in the Clery handbook; 2) the need to keep up with changes in Clery requirements; and 3) sometimes conflicting advice from Clery experts.

## Emergency notifications and timely warnings

According to the Clery handbook, “The Clery Act requires every institution, without exception, to have and disclose emergency response and evacuation procedures that would be used in response to a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.” Examples could be a serious disease outbreak, impending severe weather or an unfolding terrorist attack.

The law requires that each institution test its emergency response system at least once a year.

In addition to emergency warnings, which are issued in response to immediate threats, the Clery Act also requires institutions to have a system for issuing timely warnings. Timely warnings are required when a crime already has occurred, but represents a continuing threat, such as a string of sexual assaults or car thefts.

Thirty-five of 37 institutions reported that they have procedures for non-weather emergency response and evacuation procedures. Two institutions reported they do not have such procedures. In a followup query, one institution reported that it does have emergency procedures and had simply answered this question incorrectly. The other institution indicated that its emergency procedures are part of the procedures implemented by the larger institution with which it shares a campus.

Twenty-eight institutions, or slightly more than 75 percent, reported that they conduct regular drills to test these procedures. Seven, or almost 19 percent, reported that they do not conduct such drills. However, in a followup query, all seven of these respondents said they had misunderstood the question or answered in error.

All said they conduct some form of drill.

Twenty-two institutions, or almost 60 percent, said they issued emergency notifications in 2017, while 15 said they did not. Of those that issued notifications, most said they issued one or two, but one institution reported issuing 21 and another reported issuing 46 notifications.

Asked if they had issued any timely warnings in 2017, 19 institutions, or almost 51 percent, said yes. Eighteen institutions (49 percent) said they did not issue a timely warning.

The number of warnings issued by institutions for that year ranged from one to 20.

## What can the state do to help?

When asked how the state could help universities and colleges better comply with the Clery Act, 32, or almost 89 percent, of institutions pointed to the need for compliance training. Many cited the time and expense involved in traveling out of state to seek Clery compliance training.

Twenty-five, or almost 75 percent, said more Clery Act compliance resources from the state would be helpful. Nineteen, or almost 53 percent, asked for better defined Ohio requirements for public safety on campus in the areas of police, fire, security, emergency management, environmental health and safety. Ten offered additional comments, including these:

### WHAT THEY SAID

A sampling of survey comments

**“I feel the original purpose of Clery was proper notification of the campus community of safety and security issues. It has gotten completely out of control regarding all the other attached policies and procedures. We need to trim it back to its original purpose.”**

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- The state should provide opportunities for campus Clery coordinators to collaborate.
- The state should provide definitive standards that are not subject to varied interpretation.
- The state should provide resources tailored to the needs of different institutions. For example, community colleges with no campus housing have needs that are different from universities with housing.
- The state should act as a clearinghouse for annual campus tests of emergency response and evacuation procedures.
- The state should support smaller campuses that have fewer resources for Clery compliance.
- The state should provide funding to smaller institutions to pay for a Clery compliance officer.

## Crime data

While the Auditor of State’s office did not conduct an audit of Clery compliance by Ohio’s public institutions, AOS staff conducted a limited analysis of some Clery data to help guide development of survey questions. To begin, AOS reviewed the Clery handbook to determine the general crime reporting requirements for colleges and universities.

The law requires that any entity that receives federal Title IV funds disclose in an annual security report the previous three years of crime statistics and must file this information with the USDOE by Oct. 1. This filing can be found at: <https://ope.ed.gov/campussafety>.

The handbook distinguishes between crimes that are required to be reported and those that are not, based on property ownership and proximity. For example, reportable crimes include those that occur on campus property, on public property immediately adjacent to and accessible from campus, and on noncampus property that is owned or controlled by the university. But nearby crimes that don’t occur in these specific areas don’t have to be reported by

### Recent Ohio Clery crimes

TWO-YEAR INSTITUTIONS			
	2014	2015	2016
<b>Criminal offenses</b>			
Murder/manslaughter	0	0	0
Hate crimes	7	7	3
Rape	8	7	4
Fondling	8	14	11
Incest	0	0	0
Statutory rape	1	0	0
Robbery	12	10	8
Aggravated assault	3	5	13
Burglary	14	34	27
Motor vehicle theft	15	8	8
Arson	2	1	1
<b>Arrests reported</b>			
Weapons	11	6	6
Drugs	88	54	72
Liquor laws	40	53	40
<b>Disciplinary actions</b>			
Weapons	19	14	8
Drugs	75	70	114
Liquor laws	169	109	133
<b>Violence Against Women</b>			
Domestic violence	10	9	8
Dating violence	3	5	9
Stalking	19	25	25

FOUR-YEAR INSTITUTIONS			
	2014	2015	2016
<b>Criminal offenses</b>			
Murder/manslaughter	0	0	1
Hate crimes	9	20	60
Rape	106	116	193
Fondling	45	57	97
Incest	0	0	0
Statutory rape	1	0	1
Robbery	55	65	37
Aggravated assault	49	43	60
Burglary	196	169	236
Motor vehicle theft	41	69	68
Arson	14	15	13
<b>Arrests reported</b>			
Weapons	15	20	34
Drugs	658	829	730
Liquor laws	810	740	798
<b>Disciplinary actions</b>			
Weapons	8	3	22
Drugs	813	696	963
Liquor laws	4,251	4,068	3,987
<b>Violence Against Women</b>			
Domestic violence	39	32	27
Dating violence	72	121	106
Stalking	90	147	158

Source: USDOE website, <https://ope.ed.gov/campussafety>

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the college or university.

Also, in order to create consistency in Clery reporting, all institutions are required to report crimes based on the definitions provided in the Clery Act. These definitions sometimes do not line up with the definitions found in a state's criminal code. In answer to Question 44 in the AOS survey, several respondents said they are uncertain about whether and how to include these crimes in the annual security report.

As part of its analysis, AOS determined that all 37 institutions had completed their annual 2017 report detailing crime statistics for the previous three years -- 2014, 2015, 2016 -- as required by the Clery Act. These reports were obtained from the website for each institution. AOS also traced these filings to the USDOE website <https://ope.ed.gov/campussafety>.

In a separate review, AOS created five-year annual averages (see chart below) from the USDOE website for two-year and four-year public institutions in Ohio. The tables included these reporting categories:

- Criminal offenses
- Hate crimes
- Violence Against Women Act violations
- Arrests and disciplinary actions

The tables sorted these categories based on their Clery geography – incidents occurring on campus, on adjacent public property, and on non-campus property controlled by the institutions.

## Five-year annual averages

TWO-YEAR INSTITUTIONS			
Type	On-campus*	Non-campus	Public Property
Criminal offenses	56	19	20
Hate crimes	5	0	0
Violence Against Women Act	33	.3	4
Arrests reported	108	6	21
Disciplinary actions	252	0	5
FOUR-YEAR INSTITUTIONS			
Type	On-campus	Non-campus	Public Property
Criminal offenses	479	83	53
Hate crimes	18.4	1.6	3
Violence Against Women Act	242	14	8
Arrests reported	1,388	88	254
Disciplinary actions	5,061	19	13

### \* Location definitions

#### On-campus

(1) 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 (2) 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).

#### Non-campus building or property

(1) Any building or property owned or controlled by a student organization that is officially recognized by the institution; or (2) Any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

#### Public property

All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

# THE CLERY ACT

## Recommendations

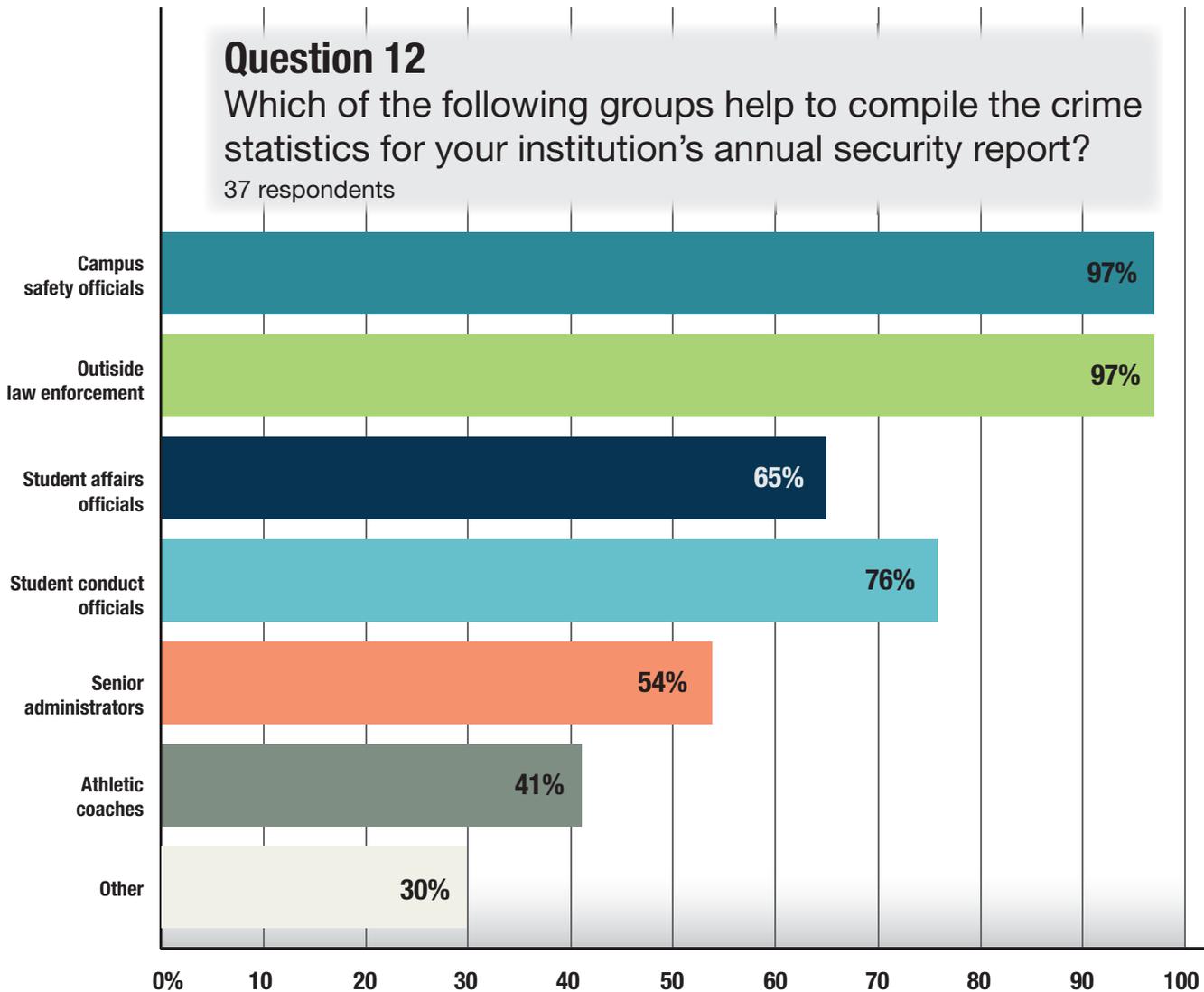
Based on survey responses and research, AOS recommends that:

- 1** | **The Ohio Department of Higher Education** or the Ohio Department of Public Safety provide regular Clery Act compliance training for colleges and universities across the state. The goal would be to make this training convenient and affordable, especially for smaller institutions.
- 2** | **The Ohio Legislature consider** increasing Clery compliance support, including a resource center to provide assistance to higher education institutions. The center could include a help-line for quick resolution of Clery Act questions.
- 3** | **Ohio create an online platform** where university and college Clery compliance staffers can collaborate and support one another in their work. The state of Ohio could facilitate a roundtable discussion or conference among colleges and universities to discuss various issues involving the Clery Act.
- 4** | **The Ohio Legislature consider** requiring the state's higher education institutions to submit their Clery Act Annual Security Reports to the Ohio Department of Public Safety. There is no central reporting point at the state level to receive, analyze and monitor Clery crime statistics on Ohio campuses. This information may be a useful tool for the state to identify trends and compare crime rates among Ohio campuses and with those in other states and propose ways to reduce campus crime.
- 5** | **Provided that adequate resources are available**, the state could require colleges and universities publish on their website the daily crime reports, as well as a map of recent crime activity that allows users to see where crimes are occurring on the campus.



## The Survey

The following is a sampling of the questions asked in the survey sent to the 14 public universities and 23 community colleges in Ohio. Complete survey results can be found at [www.ohioauditor.gov/publications/clery/fullsurvey.pdf](http://www.ohioauditor.gov/publications/clery/fullsurvey.pdf) A school-by-school compilation of survey answers, is at [www.ohioauditor.gov/publications/clery/schoolbyschool.pdf](http://www.ohioauditor.gov/publications/clery/schoolbyschool.pdf).

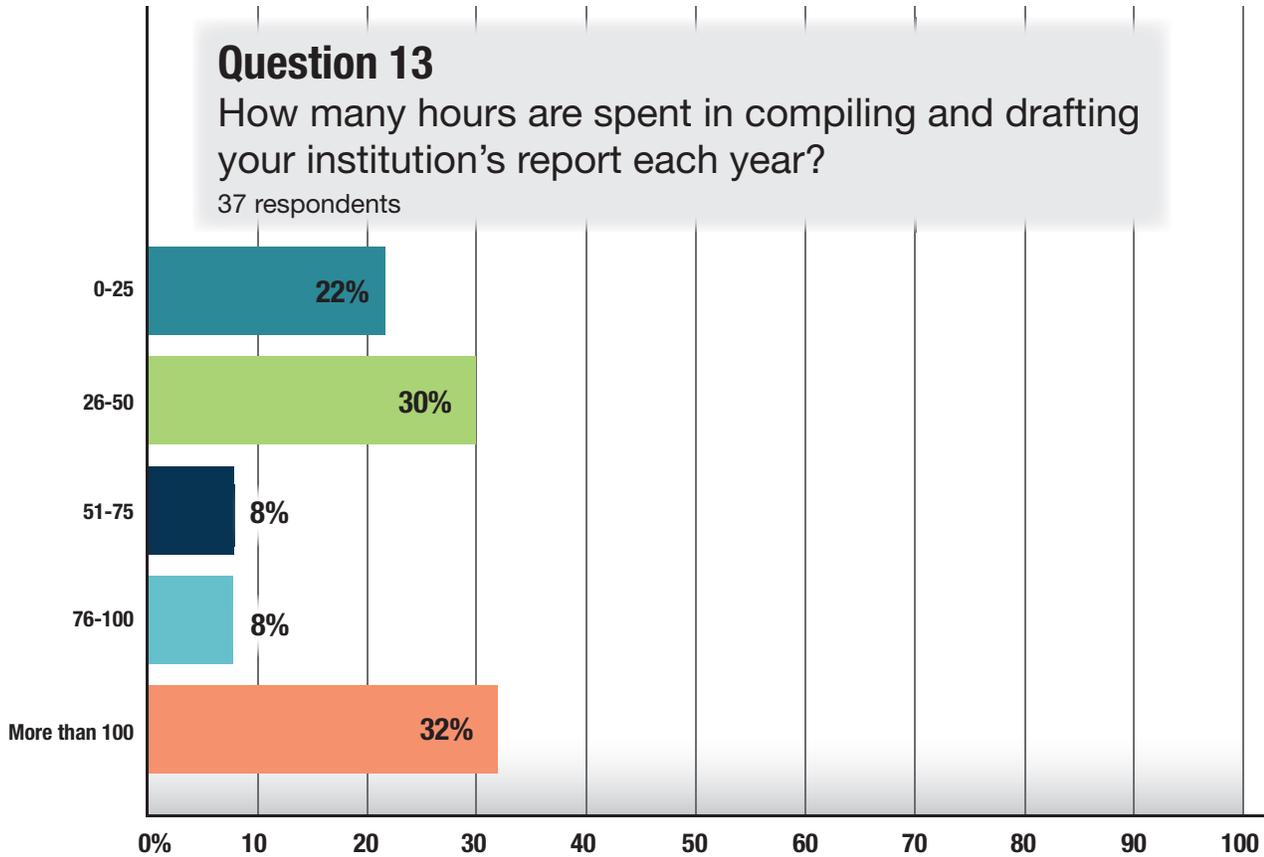


# THE CLERY ACT

## Question 13

How many hours are spent in compiling and drafting your institution's report each year?

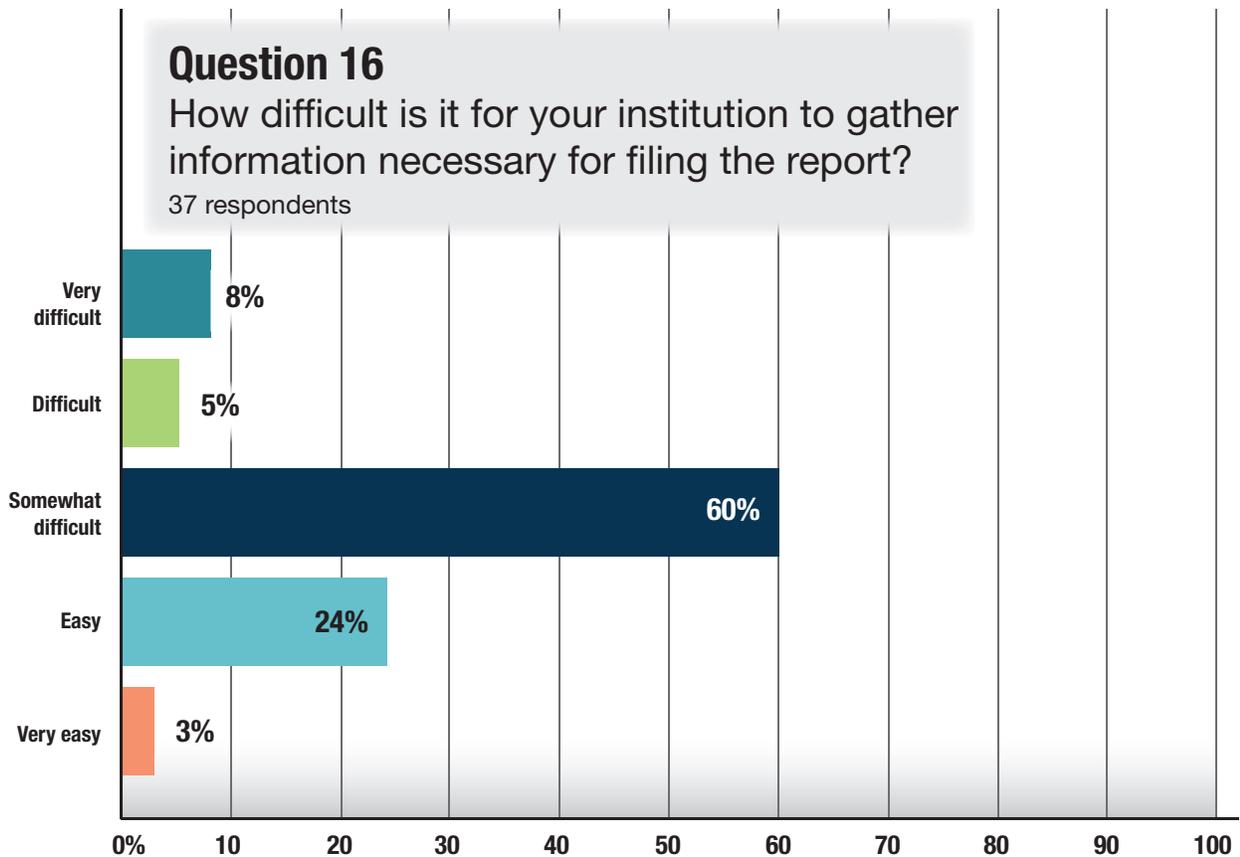
37 respondents



## Question 16

How difficult is it for your institution to gather information necessary for filing the report?

37 respondents



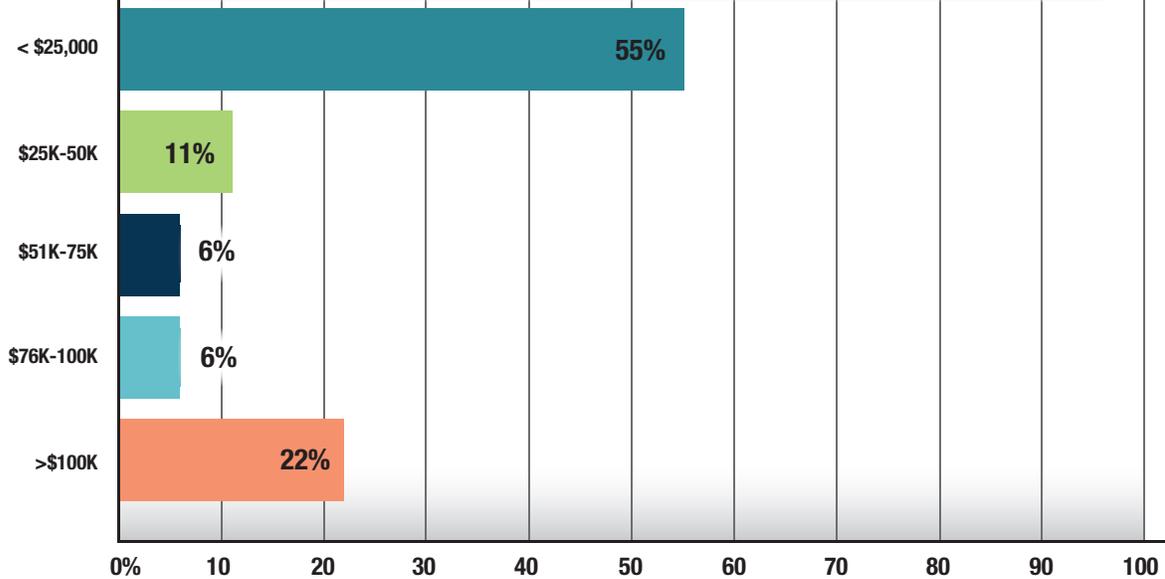
# THE CLERY ACT

## Question 17

What is your institution's total annual cost of complying with the requirements of the Clery Act?

(Include all costs associated with preparing the Annual Security Report, adopting a safety plan, conducting drills, staff time, working with local police in compiling crime statistics, obtaining advice from a Clery consultant or attorney, etc.)

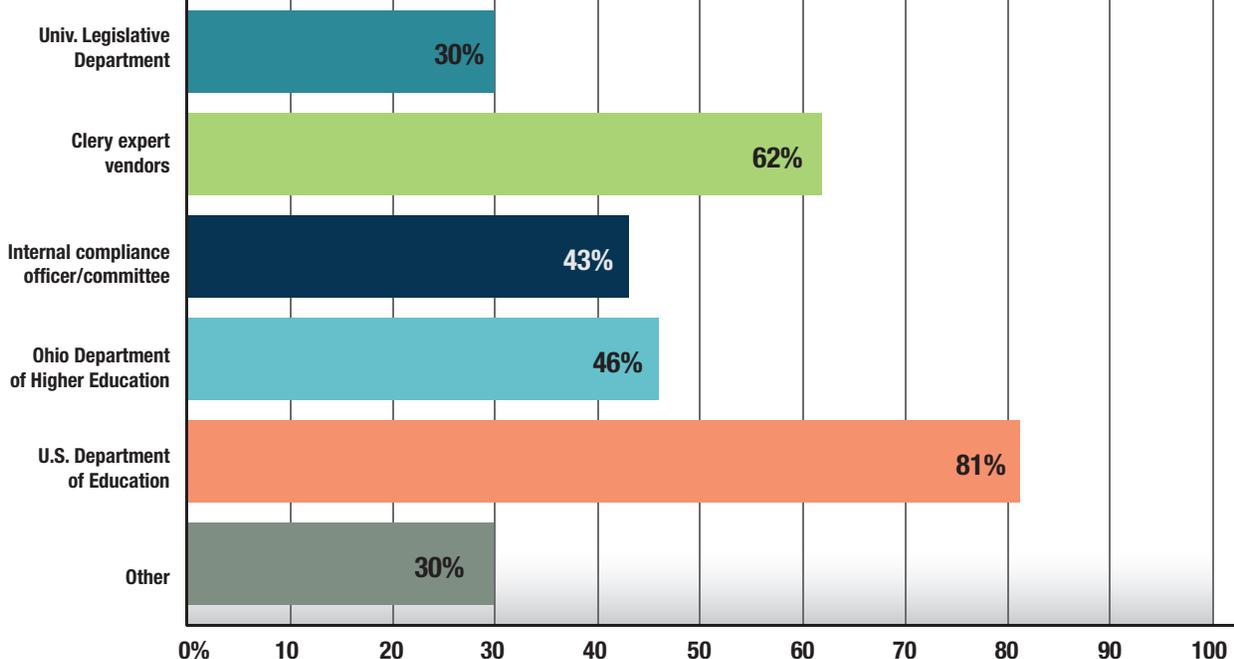
36 respondents



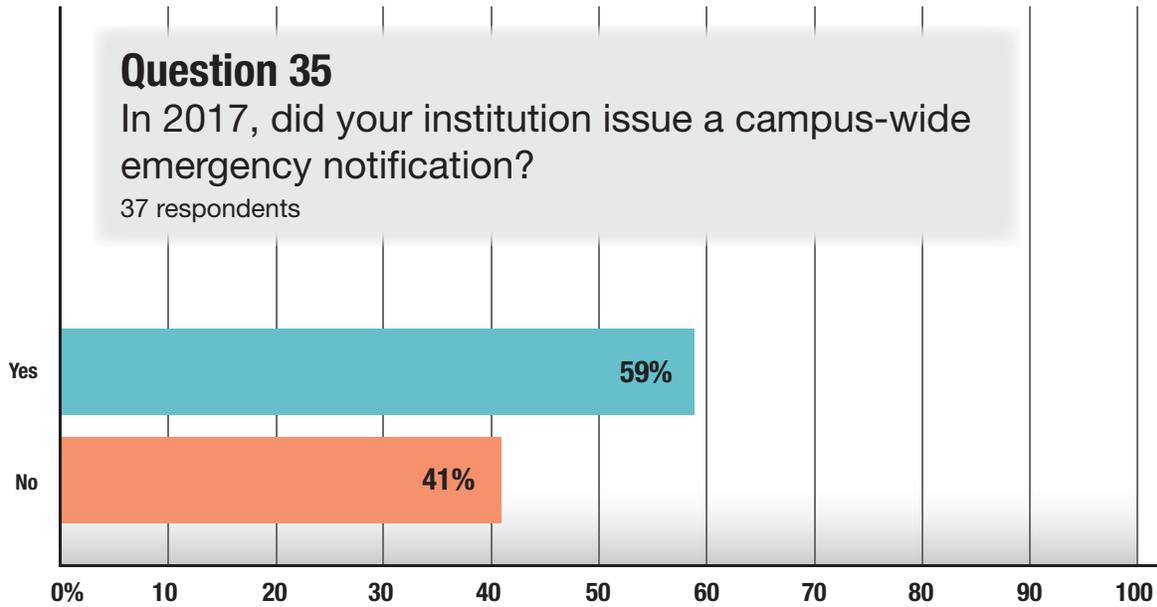
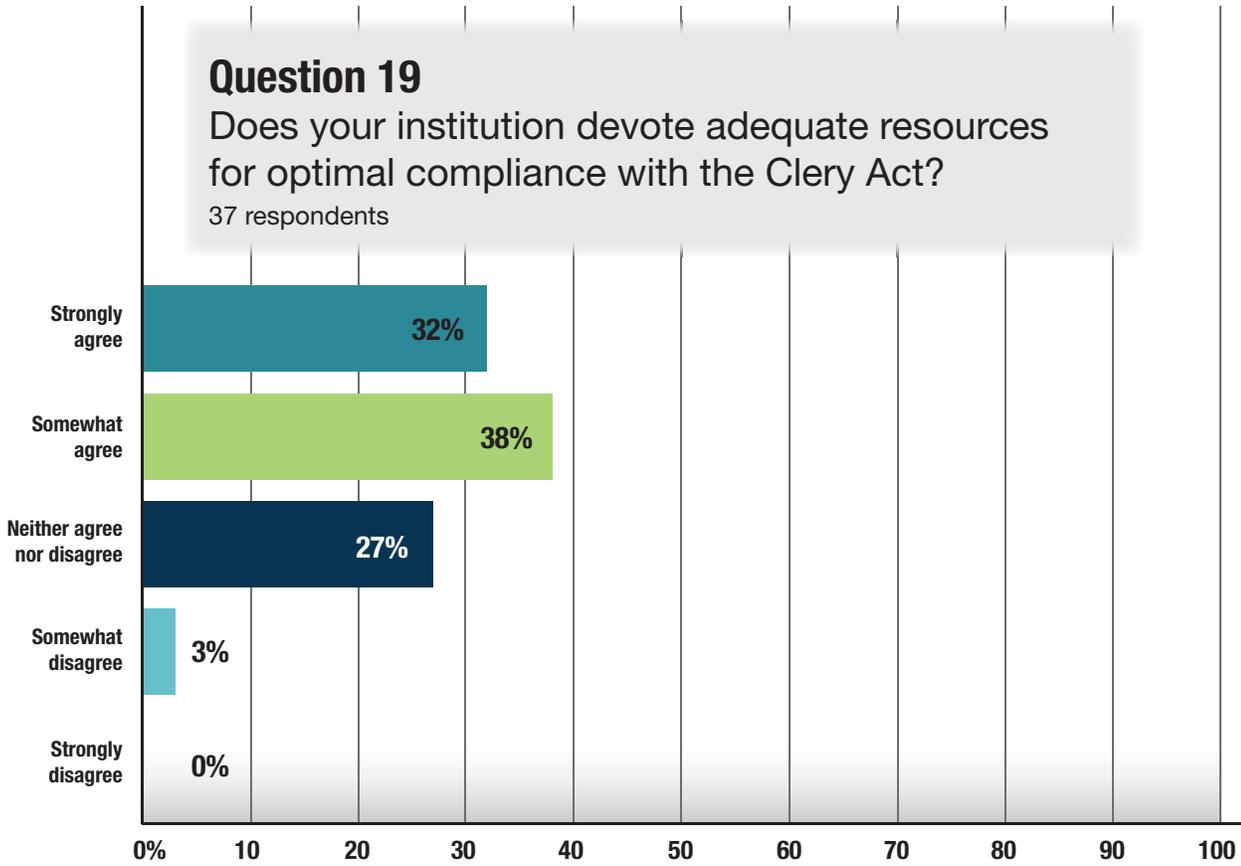
## Question 18

Who does your institution consult with to monitor for changes in Clery Act compliance requirements?

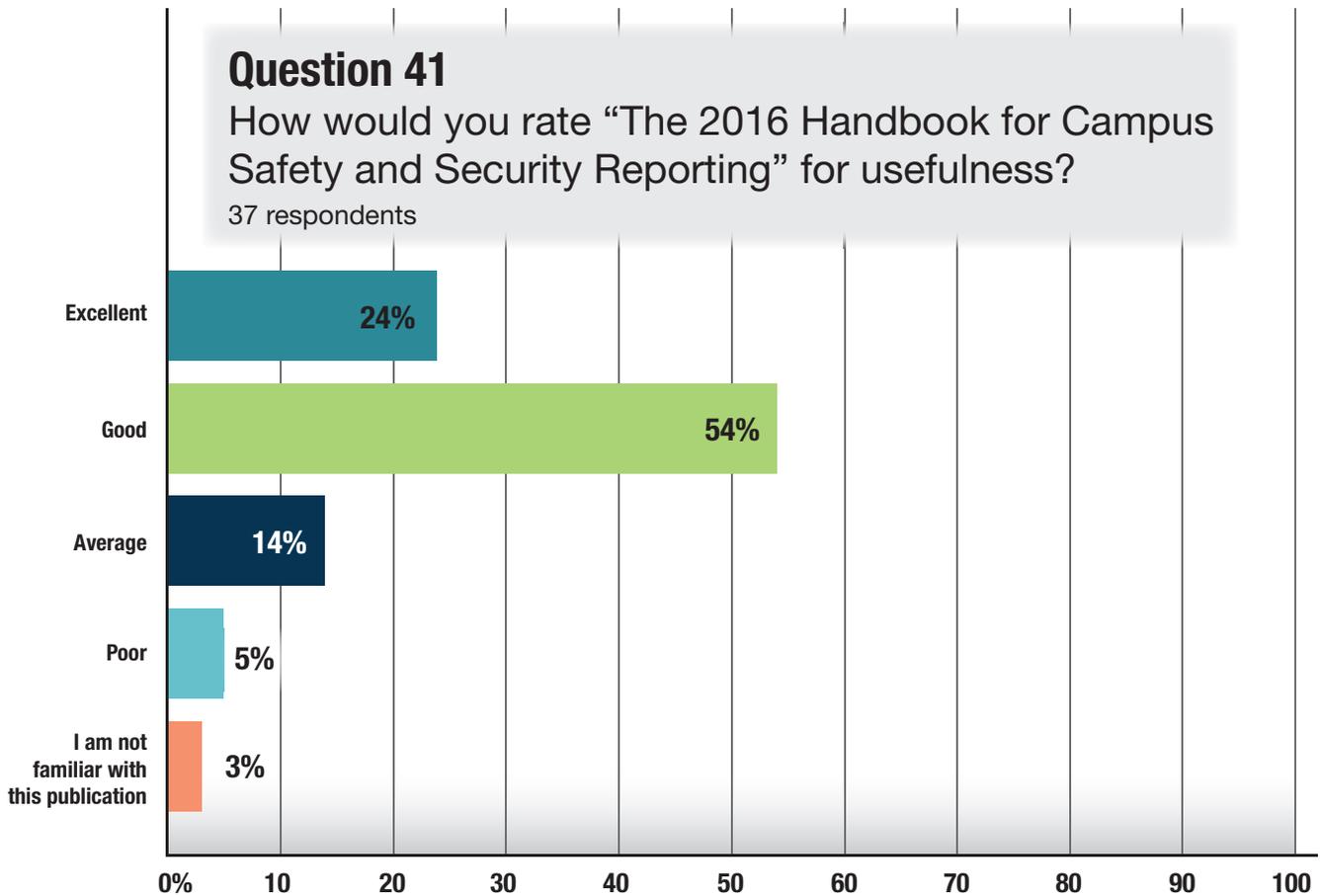
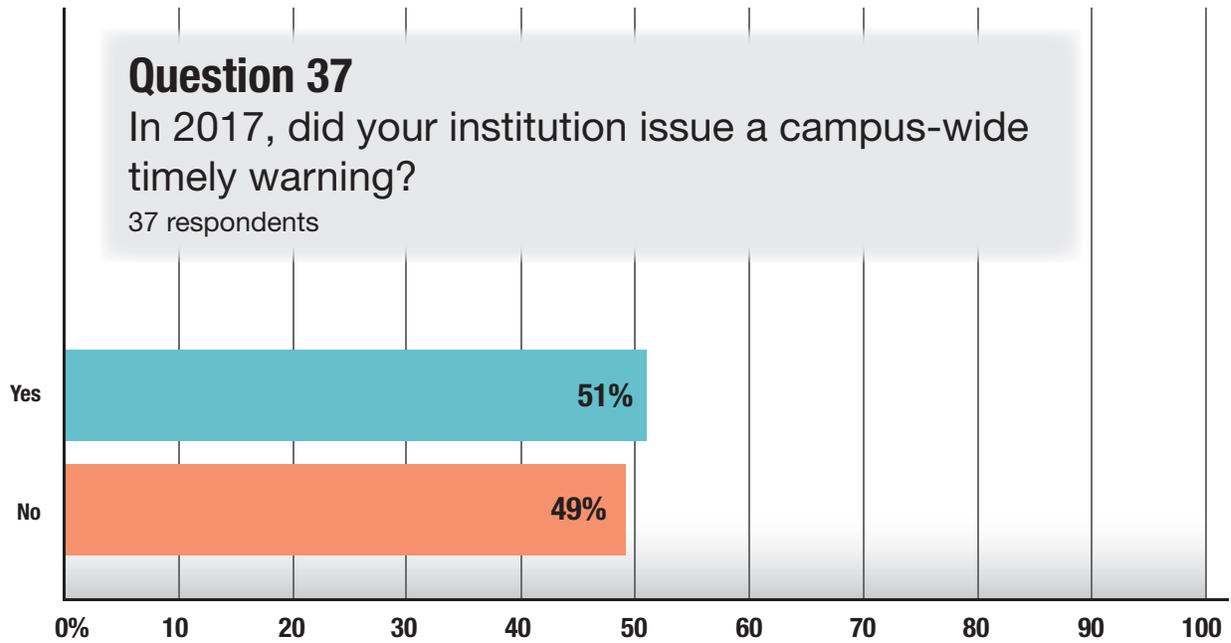
37 respondents



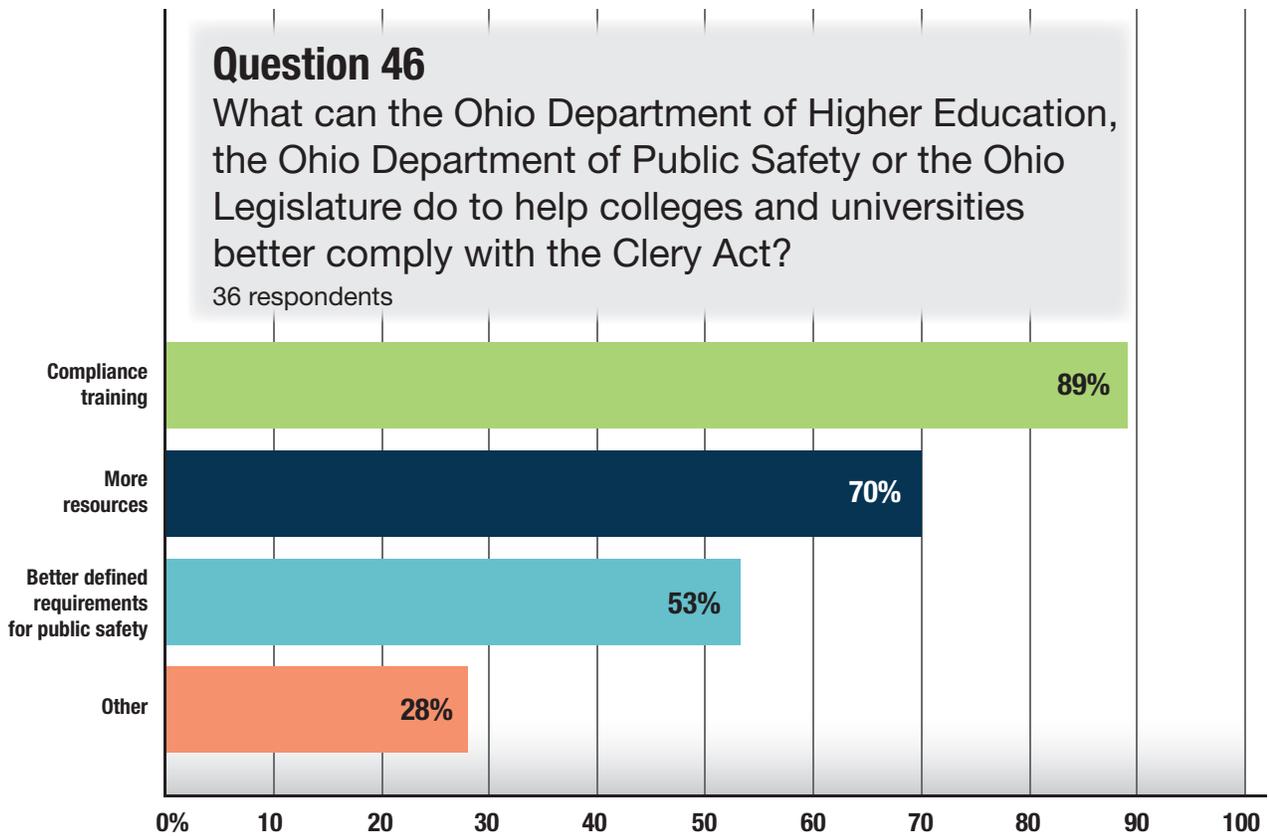
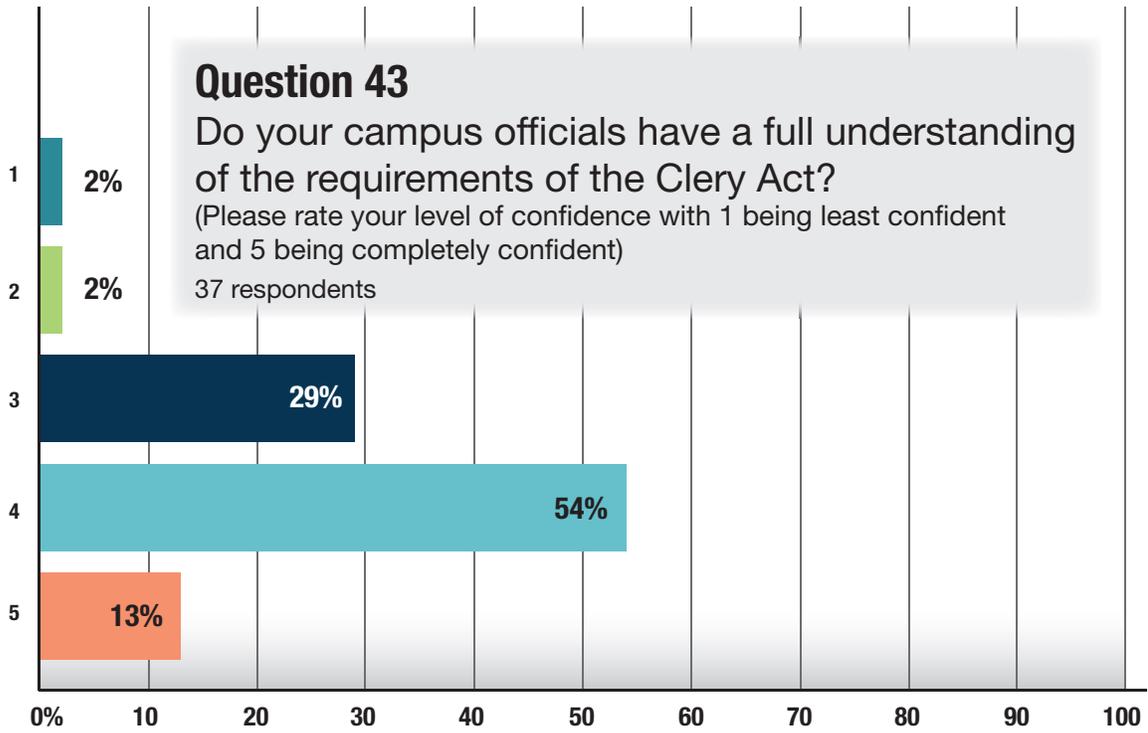
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