



Origination: 3/24/2017
Last Revised: 9/11/2021
Next Review: 9/11/2022
Owner: Melinda Latas: Dir SW
Clery&Cmps Pub Saf Comp
Area: Business and Finance
Codes: EO 1107

Implementation of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the “Clery Act”)

Policy

The California State University (CSU) is committed to promoting the safety and security of its Campus communities to provide a supportive and accessible living, learning, and working environment, including identifying conditions or circumstances that may pose risks to the safety and security of the university, and preparing the university to respond effectively to emergencies.

Accordingly, each CSU Campus and, where applicable, a Separate Campus as defined below, shall comply with the requirements of the Higher Education Opportunity Act of 2008, including [20 U.S.C. § 1092\(i\)](#) and [20 U.S.C. § 1092\(f\)](#), also known as the Jeanne Clery Disclosure of Campus Safety Security Policy and Campus Crime Statistics Act, commonly referred to as the Clery Act. Each CSU Campus shall also comply with the implementing regulations found at [34 C.F.R. § 668](#).

Capitalized terms in this policy are defined below and in [34 C.F.R. § 668.46\(a\)](#) and [34 C.F.R. § 668.49](#).

These requirements include, but are not limited to:

- A. Collect, classify, and count specified crime reports and crime statistics
- B. Issue Campus alerts: 1) timely warnings; and 2) emergency notifications
- C. Publish an Annual Security Report (ASR)
- D. Submit specified crime statistics to the Department of Education
- E. Keep a crime log
- F. For those with on-campus housing:
 - 1. Disclose missing student notification procedures consistent with the regulations at [34 C.F.R. § 668.46\(b\)\(14\)](#).
 - 2. Disclose fire safety information; *i.e.*, the Annual Fire Safety Report (AFSR), fire log, and fire statistics, consistent with the Higher Education Opportunity Act of 2008 ([20 U.S.C. § 1092\(i\)](#)) and the implementing regulations found at [34 C.F.R. § 668.49](#).

Procedure

Campus Policies and Procedures

Campuses shall develop and adopt policies for the following topics, and include statements of these policies in their Annual Security Report as required by [34 C.F.R. § 668](#).

- A. Timely Warning. A copy of the policy that Campuses shall use is provided in Appendix A
- B. Emergency Notification. A copy of the policy that Campuses shall use is provided in Appendix B
- C. Procedures for students and others to report criminal actions or other emergencies on Campus
- D. Security of and access to Campus facilities and security considerations for maintenance of Campus facilities
- E. A policy concerning Campus law enforcement
- F. Monitoring and recording crime activity at Noncampus locations of student organizations
- G. Possession, use, sale, and enforcement of federal and state alcohol & drug laws
- H. Dating Violence, Domestic Violence, Sexual Assault and Stalking (DVSAS) prevention, response, and disciplinary procedures
- I. Missing student notification procedures for on-campus student housing

Clery Director

Each Campus president shall designate a director for Clery Act compliance (hereafter referred to as Clery Director) who reports to and is supervised by a vice president. The Clery Directors shall be Management Personnel Plan employees. The Clery Director shall not be a member of the University Police Department (UPD), but shall have access to necessary law enforcement information and work closely with the Campus University Police Department.

Roles and Responsibilities

The Clery Director is responsible for directing, collaborating, and coordinating Clery reporting and compliance for the Campus, serves as the "Campus Safety Survey Administrator" as defined by the Department of Education, and coordinates with and provide reports to the system-wide Clery Compliance Officer in the Chancellor's Office. As the Campus Safety Survey Administrator, the Director submits crime statistics to Department of Education for reportable crimes under the Clery Act for the preceding year by type, location and year. The Director is responsible for the activities of the Clery Compliance Team (CCT) on Campus, including developing, revising, and maintaining the Campus-specific Clery Act compliance programs, policies, and procedures described in this policy. The Director shall also serve as the Campus's record custodian for Clery Act reports and audits, along with training materials and training records of participants.

The Director is responsible for implementation of the policies and procedures consistent with this policy and the Clery Act, including:

- A. Collecting, analyzing, and ensuring the accuracy of all data related to the Campus's reporting requirements under the Clery Act, including preparing and distributing the Annual Security Report on behalf of the Campus.
- B. Ensuring the Campus's compliance with California's statutory provisions that govern student safety under

Chapter 15.5 of the Donahoe Higher Education Act found in the Education Code.

- C. Compiling the reports of occurrences and arrests for crimes occurring in the Clery geographic area for reporting that involve violence, hate violence, theft, destruction of property, illegal drugs, or alcohol intoxication committed on Campus, publishing a Campus Safety Plan, and transmitting to the system-wide Clery Compliance Officer the Campus's report of Hate Crimes and noncriminal incidents of hate violence, and making the reports available to the public by posting them on the Campus's website.
- D. Working with UPD to ensure all reported statistics to UPD or another Campus Security Authority are also included in the crime log.
- E. Working collaboratively with Human Resources to help identify job classifications with functions that meet the definition of Campus Security Authorities (CSAs), coordinates notice to and/or training for CSAs, and providing oversight of all requirements for CSAs.
- F. Conferring with appropriate officials regarding the Campus's Timely Warning Bulletins and Emergency Notifications as described in this policy.

Vice President

The vice president reviews the Annual Security Report prior to publication and dissemination, supports the Clery Director in their effort to establish and maintain effective systems to implement this policy, facilitates collaborative data and information collection, and ensures that Campus procedures and practices are consistent with CSU policies relative to Clery-related and associated Campus safety requirements.

Campus Security Authorities (CSA)

California State University encourages all members of the Campus communities to contact the UPD when they have been the victim of or have witnessed criminal actions. Campus Security Authorities as defined by the Clery Act and identified by the Clery Director have specific obligations under the Act, which are described below.

Roles and Responsibilities

CSAs must promptly report allegations of Clery crimes that occur within a Campus' Clery Geography that are reported to them. A report may be a written or verbal disclosure made by any person to the CSA, including information shared with the CSA by witnesses or other third parties. CSA reports must include the following, if known:

- A. The crime that was reported and the information provided
- B. The exact location where the reported crime occurred
- C. The date and time the reported crime occurred
- D. Any witness and perpetrator information
- E. Victim information, unless the victim requests confidentiality (Employees may be required to share this information with other offices if they have responsibilities under other laws and policies including, but not limited to, Mandatory Reporting of Child Abuse and Neglect, and Systemwide Sex Discrimination, Sexual Harassment, Sexual Misconduct, Dating and Domestic Violence, and Stalking Policy.)

In the event the victim does request confidentiality, enough information must be obtained and provided by the CSA about the criminal incident to prevent over-reporting or "double-counting" of the incident.

Identification and Notification. It is the responsibility of the Clery Director to identify who, as a result of their job duties and function at the Campus, is a CSA as defined by [34 C.F.R. § 668.46\(a\)](#). Human Resources shall provide the Clery Director with relevant position and personnel information to make these determinations, and otherwise assist with CSA identification as directed by the Clery Director. The Campus shall notify CSAs of their status and responsibilities.

Training. Campus Security Authorities must complete training as directed by the Clery Director. The Clery Director shall coordinate with the CSAs supervisor to ensure timely completion of training. The Clery Director shall determine the appropriate frequency of training.

Subject to [34 C.F.R. § 668.46\(a\)](#), contractors, volunteers, or other persons identified as CSAs by the Clery Director shall be informed of their reporting responsibilities.

Clery Compliance Team (CCT)

Each Campus shall form a cross-departmental CCT led by the Clery Director (or management designee). The Clery Director shall at least be a member of the team if they are not the chair. The CCT includes, at minimum and to the extent these positions exist on the Campus, a Student Conduct Administrator, the Title IX Coordinator, the Chief of Police, the Chief Human Resources Officer, the Director of Housing and/or Residential Life, the Greek Life Director, the Athletic Director, the Dean of Students or Vice President of Student Affairs, the Public Information Officer, the Director for International Programs, and Campus Counsel. The CCT shall assist the Clery Director in the collection of information and required crime statistics, assist in developing, writing, reviewing and ensuring the accuracy of the Annual Security Report (ASR) and Campus policies required to be included in the ASR, assist in the proper identification of relevant Clery Geography, assist in programming, developing, and providing training and outreach efforts on the Campus for compliance, and assist in overall compliance with the Clery Act and state student safety laws. The CCT shall meet quarterly, or more frequently if needed.

Title IX Coordinator

The Title IX Coordinator shall additionally assist the Clery Director with Clery compliance by:

- A. Providing written rights and options information to victims of Sexual Misconduct, as the responsible party assigned by [Systemwide Sex Discrimination, Sexual Harassment, Sexual Misconduct, Dating and Domestic Violence, and Stalking Policy](#) and required by [34 C.F.R. § 668.46](#).
- B. Remaining primarily responsible for ensuring all Campus-based prevention and awareness activities, through cross-divisional partnerships, as assigned by [Systemwide Sex Discrimination, Sexual Harassment, Sexual Misconduct, Dating and Domestic Violence, and Stalking Policy](#) and required by [34 C.F.R. § 668.46](#).
- C. Ensuring all employees on the Campus who are involved in investigating or adjudicating allegations of Sexual Misconduct are trained annually as required by [34 C.F.R. § 668.46](#).

Chief of Police

The Chief of Police shall additionally assist the Clery Director with Clery compliance by:

- A. Ensuring the UPD fulfills its responsibility for conducting documented outreach to law enforcement agencies as required by [34 C.F.R. § 668.46\(c\)\(11\)](#) and as stated in these procedures, and the accompanying requirement to forward this information to the Clery Director.

- B. Ensuring UPD fulfills its responsibility for maintaining a crime log as required by [20 U.S.C. § 1092\(f\)\(4\)](#) and as stated in these procedures.
- C. Conferring with the Clery Director (or management designee), if available, to facilitate issuance of Timely Warning Crime Bulletins, as stated in the Timely Warning Policy.
- D. Conferring with any appropriate public official (e.g., fire chief, health department) and any Campus officials to facilitate issuance of Emergency Notifications as stated in the Emergency Notification Policy.

Director of Housing and/or Residential Life

The Director of Housing and/or Residential Life shall additionally assist the Clery Director with Clery compliance by:

- A. Compiling and publishing the Annual Fire Safety Report as required by [20 U.S.C. § 1092\(i\)](#) and as stated in these procedures.
- B. Coordinating with the Clery Director to send a notice of availability of the Annual Fire Safety Report (AFSR) in conjunction with the notice of availability of the Annual Security Report as required by [34 C.F.R. § 668.41](#).
- C. Coordinating with the Clery Director and UPD to ensure that the Campus maintains a fire log that complies with the requirements of [\(20 U.S.C. § 1092\(i\)\)](#).

Persons on the Clery Compliance Team who as part of their operational duties under this policy create or maintain records substantiating Clery compliance activities shall preserve those records pursuant to the [Systemwide Records Information Retention and Disposition Schedules Implementation Policy](#) and applicable [retention and disposal schedules](#). These persons shall consult with the Clery Director prior to destruction of records. These persons shall provide those records to the Clery Director if requested.

Director of Systemwide Clery and Campus Safety Compliance

The Director of Systemwide Clery and Campus Safety Compliance (Also known as the Systemwide Clery Compliance Officer, or CCO) provides overall leadership for compliance with the Clery Act and related statutes. The CCO provides regular guidance, training, and tools to the Clery Directors across the system to support them and their Campuses in meeting regulatory requirements. The CCO may write and revise systemwide policy and official directives as needed, including in response to emerging issues or changes to the regulatory environment. The CCO consults with Campuses and the Office of General Counsel (OGC) to provide advice on specific questions and challenges as needed. The CCO and Clery Director shall work together to respond to any official notice of a program review or similar inquiry from the Department of Education or other agency.

The Crime Log

Crime Log Requirements

Unless the disclosure is prohibited by law; or would jeopardize the confidentiality of the victim, all reported crimes within the parameters listed below must be recorded in the crime log within two Business Days of the report to University Police Department (UPD) or other Campus Security Authority (CSA). This includes a crime initially reported to a local law enforcement agency, which was subsequently reported to the UPD. UPD shall collaborate with the Clery Director to develop and maintain adequate controls to ensure the

completeness of the crime log. Applicable reported crimes include:

- A. All criminal incidents and/or reports of criminal incidents on Campus, on Public Property within or immediately adjacent to Campus, or on non-campus buildings or property as defined by [34 C.F.R. § 668.46\(a\)](#) that are reported directly to the UPD.
- B. All criminal incidents and/or reports of criminal incidents within the "patrol jurisdiction" of the UPD, which includes any property not defined above that is regularly provided with police or security patrol services by the UPD. Each campus shall determine the scope and extent of its "patrol jurisdiction".
- C. Reports of Clery crimes on Campus, on Public Property within or immediately adjacent to Campus, or on non-campus buildings or property as defined by [34 C.F.R. § 668.46\(a\)](#) made to a Campus Security Authority
- D. Reports of Clery crimes on Campus, on Public Property within or immediately adjacent to Campus, or on non-campus buildings or property as defined by [34 C.F.R. § 668.46\(a\)](#) made to another law enforcement agency and subsequently reported to UPD.

All reported crimes occurring during a single criminal event must be listed on the crime log. The Uniform Crime Reporting (UCR) Hierarchy Rule does not apply to the Crime Log.

The crime log entry shall include, but is not limited to, the following five informational items:

- A. Date reported;
- B. Nature of the crime(s);
- C. General location; (must describe where the crime actually occurred, not where the report was filed or statement obtained)
- D. Date and time occurred (If the exact date and/or time are unknown or not reported, state "unknown" or include appropriate date range); and
- E. Current disposition of the crime(s)

The crime(s) must be described in a manner that can be easily understood by the reader and shall not use ambiguous terms, or solely reference code section(s), initials and/or abbreviations for the crime(s). The general location shall be written in a manner that is understood by, and meaningful to, the Campus community. For example, if a crime is reported to have occurred in a parking structure, the name of the parking structure shall be used instead of listing the location as "a parking structure". Abbreviations for buildings or locations, as well as room, office, or suite numbers, shall not be used.

Maintaining the Crime Log

- A. The UPD must record all reported crimes within two Business Days of when the report was received by the UPD.
- B. The crime log must be organized by the date the crime was reported to the UPD. If the UPD receives a report of a crime from a CSA or other law enforcement agency that cannot be matched to a crime previously entered into the crime log, then the report of the crime shall be entered into the Crime Log by the date the report was received by UPD from the CSA or the other law enforcement agency.
- C. If authorized by the Chief of Police, (or management designee), the UPD may temporarily withhold the reporting of information in the crime log only if there is clear and convincing evidence that the release of the information would:
 - 1. Jeopardize an on-going investigation;

2. Jeopardize the safety of an individual;
3. Cause a suspect to flee or evade detection; or
4. Result in the destruction of evidence.

The UPD may withhold only that information which could cause the specifically identified adverse effect. The withheld information must be disclosed immediately once the adverse effect is no longer a risk. The Chief of Police (or management designee) is responsible for appropriately documenting any decision to withhold information from the crime log.

- D. If new information about an entry into a log becomes available, then the new information shall be recorded in the log no later than two Business Days after the information becomes available.
- E. The disposition shall be updated if the initial disposition is determined to be incorrect or has changed. The disposition for each crime reported is not required to be updated after sixty (60) days have passed from the date when the crime was first entered into the crime log.
- F. The crime log may be kept in digital format, as a hard copy, or both. In addition, the UPD must make the crime log available, free of charge, for review/inspection immediately upon request during normal business hours for the most recent sixty (60) day period. Any portion of the crime log older than the most recent sixty (60) days, and still retained under the records retention schedule, must be produced within two Business Days of a request.

The Annual Security Report (ASR)

Each Campus and Separate Campus, if applicable, shall prepare, publish, distribute and maintain an ASR containing policy statements required by [34 C.F.R. § 668.46](#), and statistics of Clery crimes for that Campus. The Separate Campus ASR(s), if applicable may be combined with the Campus ASR. The ASR shall not be combined with the Annual Fire Safety Report.

For the purpose of Clery Act requirements, the CSU defines an additional location as a Separate Campus if it meets all of the following criteria:

- A. *Your institution owns or controls the site*
- B. *It is not reasonably geographically contiguous with the main Campus*
- C. *It has an organized program of study; and*
- D. *There is at least one person on site acting in an administrative capacity.*

Campuses shall prepare the ASR using the following procedures to ensure compliance and accuracy of the information contained in the ASR. Campuses shall publish the ASR using a format distributed by the system-wide Clery Compliance Officer. The Campus ASR draft shall be prepared in cooperation with, and reviewed by, the CCT. If applicable under CSU cooperative agreement, the Campus shall utilize independent expert review of the draft. Following review by the CCT, the draft shall be reviewed by Campus Counsel, and the Vice president to whom the Clery Director reports. Review shall consist of an evaluation and confirmation of existence of required policies, completeness and accuracy of crime statistics and policy statements, and updates, where necessary. Written response from each reviewing office with suggested changes or a statement that no changes are necessary shall be provided to the Clery Director at each stage of review.

- A. **Compilation and Accuracy of Statistics for the ASR.** The Clery Director is responsible for the collection and compilation of crime statistics for Clery crimes, including Hate Crimes, by and through working relationships with Campus Security Authorities, University Police Department (UPD) and the

CCT. UPD is responsible for conducting documented outreach to law enforcement agencies to request Clery crime statistics from the Clery Geography that UPD does not patrol or provide primary law enforcement response, and required to forward this information to the Clery Director.

In addition, the Clery Director shall query members of the CCT to collect, classify, and reconcile crimes and violations of state and local drug, liquor, and weapons laws occurring within Clery Geography where arrests or referrals for discipline of students or employees were made.

- B. **Distributing the ASR.** The ASR must be distributed in accordance with the regulations at [34 C.F.R. § 668.41](#). It shall be posted on the Campus's website and a hard copy must be available upon request. The Clery Director in coordination with the appropriate departments shall no later than September 15 distribute a notice by email to all current students and employees that the ASR is published and available. The email notice shall read as follows:

Pursuant to the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act*, the (current year) Annual Security Report (ASR) is now available for viewing at (exact url address). The ASR contains the current security and safety-related policy statements, emergency preparedness and evacuation information, crime prevention and Sexual Assault prevention information, and information about drug and alcohol prevention programming. The ASR also contains statistics of Clery crimes for [name of Campus] for [three years preceding the date of publication]. A paper copy of the ASR is available upon request by contacting the Office of the Clery Director located at [Campus contact information].

The Clery Director in coordination with the Human Resources Department, Office of Admissions, or other appropriate department shall, no later than September 15 of each year, ensure that the above-described notice is posted in appropriate locations to ensure notice is provided to all prospective employees and students that the ASR is available upon request. These locations vary from Campus to Campus and depending on the structure of their webpage may include:

1. Campus employment websites
2. Campus application materials
3. Campus course catalogs

The Annual Fire Safety Report (AFSR)

Each Campus and/or Separate Campus that maintains on-campus student housing facilities shall prepare, publish, distribute and maintain an AFSR, which shall contain information with respect to the Campus fire safety practices and standards of that Campus. The AFSR shall not be combined with the Annual Security Report.

- A. **Compilation and Accuracy of Statistics and information for the AFSR.** The AFSR shall be compiled at the direction of the Director of Housing and/or Residential Life. The Director of Housing and/or Residential Life shall consult with the appropriate fire safety administrator on the Campus to ensure accurate and complete information. The AFSR shall include the following:
1. statistics concerning the following in each on-campus student housing facility during the most recent calendar years for which data are available:
 - a. the number of fires and the cause of each fire;
 - b. the number of injuries related to a fire that result in treatment at a medical facility;

- c. the number of deaths related to a fire; and
 - d. the value of property damage caused by a fire;
2. a description of each on-campus student housing facility fire safety system, including the fire sprinkler system;
 3. the number of regular mandatory supervised fire drills;
 4. policies or rules on portable electrical appliances, smoking, and open flames (such as candles),
 5. procedures for evacuation,
 6. policies regarding fire safety education and training programs provided to students, faculty, and staff; and
 7. plans for future improvements in fire safety, if determined necessary by such institution

B. **Distributing the AFSR.** The AFSR must be distributed in accordance with the regulations at 34 C.F.R. § 668.41. It shall be prominently posted on the home page for residential life and/or student housing and a hard copy must be available upon request. It shall be published and distributed to all students and employees by September 15 in coordination with the Clery Director. The email notice shall read as follows:

Pursuant to the *Higher Education Opportunity Act*, the (current year) Annual Fire Safety Report (AFSR) is now available for viewing at (exact url address). The purpose of this report is to disclose statistics for fires that occurred within (Campus name) housing facilities for [three years preceding the date of publication], and to distribute fire safety policies and procedures intended to promote safety on Campus. A paper copy of the AFSR is available upon request by contacting the Housing Office located at [Campus contact information].

The Director of Housing and/or Residential Life in coordination with the Clery Director, Human Resources Department, Office of Admissions, or other appropriate department shall, no later than September 15 of each year, ensure that the above-described notice is posted in appropriate locations to ensure notice is provided to all prospective employees and students that the ASR is available upon request. These locations vary from Campus to Campus and depending on the structure of their webpage may include:

1. Campus employment websites
2. Campus application materials
3. Campus course catalogs

Guidelines

Campuses are encouraged to develop written procedures for critical compliance activities including a description of processes and controls surrounding collection, classification, and reconciliation of crime reports and statistics.

Authority

This policy is issued pursuant to [Section II of the Standing Orders of the Board of Trustees of the California State University](#) as further delegated by the [Standing Delegations of Administrative Authority](#).

Appendix A

Timely Warning Policy

The systemwide Timely Warning Policy shall be adopted and followed by all Campuses of the California State University system. This policy describes the procedures that will be used to provide members of the community with information to aid in preventing them from becoming victims of crimes posing a serious or ongoing threat to the Campus communities. It is intended to provide faculty, staff, and students with timely information about Clery reportable crimes occurring within the defined Clery Geography of their Campuses, and to comply with the Timely Warning requirements of the Jeanne Clery Act.

Timely Warning Procedures

As required by the Clery Act, CSU Campuses will keep their Campus communities informed by providing a timely warning when appropriate.

- A. Upon receipt of a Campus Security Authority (CSA) report of a Clery crime on Clery Geography, a Timely Warning analysis shall be completed and documented by the Clery Director. The Clery Director shall have authority to delegate this responsibility as appropriate. It is not necessary to complete and document a Timely Warning analysis for referrals to disciplinary action.
- B. If it is determined that the report includes a Clery crime on Clery Geography, the Clery Director and Chief of Police (or management designee) will confer to **analyze** the known pertinent facts to determine whether they constitute a serious or ongoing threat to the Campus community. The unavailability of the Clery Director shall not unduly delay the issuance of a Timely Warning.
- C. If a CSA report includes 1) a Clery crime 2) on Clery Geography and 3) a discernible serious or ongoing threat, a timely warning as described below shall be issued expeditiously.
- D. In the absence of any of these three elements, no timely warning will be issued.
- E. The Chief of Police (or the management designee) shall have ultimate authority and responsibility for determining whether to issue a Timely Warning.

Each reported incident must be analyzed on a case-by-case basis. All known factors shall be considered in the case-by-case analysis to determine whether a timely warning should be issued. No single factor should govern the decision regarding the issuance of a timely warning. Campuses are prohibited from circumventing a case-by-case analysis by issuing a blanket rule that timely warnings will be issued for all reports of any given Clery reportable crime. Requests from an outside law enforcement agency to refrain from issuing a timely warning is insufficient grounds on its own for not issuing or delaying the issuing of a timely warning, unless the Chief of Police concurs that by issuing a timely warning, an identified risk can be articulated that would compromise the law enforcement efforts of the outside agency investigating the crime to gather evidence and/or apprehend suspect(s).

The case-by-case analysis will involve reviewing relevant factors including, but not limited to, the following, if known:

- A. The timing of the report: shortly after the occurrence of the crime vs. days or weeks after the occurrence of the crime, *i.e.*, a "cold report"
- B. Physical injury to the victim
- C. Use of weapons

- D. Forced entry used and/or tools used in commission of the crime
- E. A suspect arrested or incapacitated by injury
- F. A suspect that is identified or otherwise can be located by law enforcement
- G. A suspect that is out of the area
- H. A victim who fears for their safety from the suspect
 - I. A clear modus operandi and/or pre-planning indicated
- J. Multiple suspect(s) involved
- K. A pattern of similar crimes established
- L. The possible risk of compromising law enforcement efforts, such as to gather evidence and/or apprehend suspect(s), if a warning was issued

Additional Considerations. The Clery Director (or management designee) shall notify the Campus president, as soon as practicable, that a timely warning will be or has been issued.

The Chief of Police (or management designee) is responsible for collaborating with surrounding law enforcement agencies to encourage them to share information with University Police Department (UPD) about crimes reported to local law enforcement that occur in Clery Geography.

Nothing in this policy precludes Campuses from maintaining a Campus policy about informing, re-publicizing and/or sharing with the Campus community crimes or other informational notices, (e.g., traffic advisories, events, prevention information) the Campus deems may be of interest to the Campus community. Such a policy is separate and distinct from the Timely Warning Policy. Such notices must differ in appearance or be distributed in a manner that assures that members of the community understand such notices are different from a timely warning notification required by the Clery Act; members of the Campus community should not be misled to believe such notices are timely warnings.

Contents of a Timely Warning. When a timely warning is issued it shall be entitled "Timely Warning Crime Bulletin" and contain the following:

- A. A statement that reads, "This Timely Warning Bulletin is being issued in compliance with the Jeanne Clery Act and the purpose is to provide preventative information to the Campus community to aid members from becoming the victim of a similar crime."
- B. Identify the Clery reportable crime that occurred (i.e. rape, burglary, motor vehicle theft, arson, etc.)
- C. The date, time, and location the crime occurred
- D. The date the Timely Warning Bulletin is issued
- E. Description of the suspect when deemed appropriate, and if there is sufficient detail. Only include a description of the suspect when the descriptors provided by the reporting party could reasonably lead to conclusive identification of the perpetrator(s)
- F. At least three preventative tips or points of information specifically related to the circumstances of the crime which occurred that could help others from becoming the victim of a similar crime
- G. The phone number of UPD and a statement encouraging community members to report all information about crimes to UPD
- H. If appropriate, the phone number of support services

The Timely Warning shall not include, under any circumstances, the name of the victim, or information so specific (i.e. specific address or dorm room number or floor) that would or likely could identify the victim of the crimes of Sexual Violence, Rape, Dating Violence, Domestic Violence, or Stalking. Timely Warning Bulletins should use gender-inclusive and culturally-appropriate language and avoid victim blaming and bias language.

Methods of Distribution. Timely warnings will be distributed as quickly as possible in a manner that will likely reach the entire Campus community. Distribution methods vary from Campus to Campus and include, but are not limited to, any of the following:

- A. All employee and student e-mail distribution
- B. University website
- C. Public area video display monitors
- D. Hard copies posted on Campus building entrance doors
- E. Press Release

This list is not intended to be exhaustive or intended to prioritize the method of distribution. The Chief of Police will confer with the Clery Director (or management designee), if available, to determine the most appropriate method(s) to distribute a Timely Warning. In the absence of the Clery Director (or management designee), the Chief of Police will determine the appropriate method of distribution. Campuses are required to maintain a list of the methods of distribution for timely warnings and include said list in the Campus's Annual Security Report.

Appendix B

Emergency Notification Policy

The systemwide Emergency Notification Policy shall be adopted and followed by all Campuses of the California State University system. This policy describes the procedures that will be used to immediately notify the Campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students and/or employees occurring on the Campus, as required by the Clery Act.

Emergency Notification Procedures

Any member of the Campus community with information believed to constitute a significant emergency or a dangerous situation that poses an imminent or immediate threat shall report the information to University Police Department (UPD) and/or by calling "911." Examples include, but are not limited to, the following types of incidents:

- A. Severe weather warning (e.g., flash flooding, tsunami, hurricane, etc.)
- B. Environmental emergency within an on-campus facility (e.g., hazardous chemical spill, fire, earthquake, building collapse)
- C. Criminal activity with an imminent threat to Campus community (e.g., active shooter, murder, fleeing suspect with a weapon)
- D. Public Health Emergency (e.g., measles outbreak, swine flu outbreak, etc.)

Once UPD has received the report, the Chief of Police (or management designee) will, without delay and taking into account the safety of the community, confer with any appropriate public official (e.g., fire chief,

health department) and any Campus officials responsible for managing the on-campus emergency, if available, to confirm **both**: 1) a legitimate emergency or dangerous situation exists impacting on-Campus geography; **and** 2) the emergency or dangerous situation poses an immediate or imminent threat to members of the on-campus community. This confirmation process may include, but is not limited to, visual observation, officer investigation, the assistance of key Campus administrators, local or Campus first responders, and/or official government reporting through agencies such as the National Weather Service.

If both of the above factors are not met, no emergency notification is required. If it is determined that both of the above factors are met, then an emergency notification as described below shall be issued. The Chief of Police (or management designee) will confer with the Clery Director, if available, to prepare the content of the notification and determine which members of the Campus community are threatened and need to be notified. The content of the message will be developed based on a careful but swift analysis of the most critical facts.

Once the notification is prepared, the Chief of Police and/or the Clery Director (or their management designees) will, without delay and taking into account the safety of the community, transmit the emergency notification unless doing so would delay the ability to mitigate and/or contain the emergency, including the ability to provide immediate, life saving measures. If an emergency notification is issued, a timely warning shall not be issued for the same incident.

Contents of the Emergency Notification. The emergency notification shall contain the following information:

- A. A statement as to what the emergency or dangerous situation is, in specific terms (e.g., chemical spill, active shooter, building fire)
- B. A statement providing direction as to what actions the receiver of the message should take to ensure their own safety
- C. A statement as to where or when additional information may be obtained

The Chief of Police and/or Clery Director (or management designees) will provide updates to the emergency notification with pertinent updates or direction to persons for their safety when new information becomes available. Updates will be provided in regular intervals until the emergency has been mitigated or no longer poses an imminent threat, e.g., fire is out and building has re-opened.

Methods of Distribution. Emergency Notifications will be distributed as quickly as possible in a manner that will likely reach the segment(s) of the on-campus community threatened by the emergency. Segmentation will be considered by the Chief of Police (or management designee) by evaluating which persons are likely to be at risk, and notifying those persons. Segmentation should not be considered if making this determination would delay issuing the emergency notification. The Chief will determine if notification to the larger community is appropriate. Distribution methods, including distribution to the larger community, vary from Campus to Campus and depending on the nature of the emergency, may include:

- A. A Campus mass notification system, including but not limited to phone, Campus email, or text messaging. Systems should provide currently enrolled students, faculty and staff the ability to adjust their subscription preferences to select multiple contact methods from text messages, emails and phone calls, or if desired, to 'opt out' of the service and not receive any notifications
- B. Audio/visual message boards
- C. Audible alarms/sirens
- D. Campus public address systems
- E. In person or door-to-door notifications in a building or residence halls

- F. Local media
- G. Social media
- H. Other means appropriate under the circumstances

Testing and Evacuation System. Testing of the Emergency Notification System and evacuation will be done at least once annually. The Tests may be announced or unannounced. Tests must be scheduled, contain drills, exercises and appropriate follow-through activities, and be designed for assessment and evaluations of emergency plans and capabilities and may include. However, at least one Test will be publicized in conjunction with the Campus's emergency response and evacuation procedures. Each Test will be documented to include a description of the exercise, the date of the Test, the start and end times of the Test, and whether the Test was announced or unannounced. The [California State University Emergency Management](#) policy describes these Tests and defines responsibility for their completion. A copy of the documentation will be provided to the Clery Director.

All revision dates:

9/11/2021, 3/24/2017

Attachments

[Transmittal Letter](#)

Approval Signatures

Step Description	Approver	Date
EVC	Steven Relyea: Executive Vice Chan & CFO	9/11/2021
Area Manager/Owner	Bradley Wells: Assoc VC, Business & Finance	9/10/2021
Area Manager/Owner	Melinda Latas: Dir SW Clery&Cmps Pub Saf Comp	9/10/2021