



Community College Safety Reporting

2015-MS-2



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State of New York Office of the State Comptroller

Division of Local Government and School Accountability

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Dear College Officials:

A top priority of the Office of the State Comptroller is to help community college officials manage college resources efficiently and effectively and, by so doing, provide accountability for tax dollars spent to support college operations. The Comptroller oversees the fiscal affairs of community colleges statewide, as well as compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations and Board of Directors governance. Audits also can identify strategies to reduce costs and to strengthen controls intended to safeguard college assets.

Following is a report of our audit, entitled Community College Safety Reporting. This audit was conducted pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law.

This audit's results and recommendations are resources for college officials to use in effectively managing operations and in meeting the expectations of their constituents. If you have questions about this report, please feel free to contact the Statewide Audits office, as listed at the end of this report.

Respectfully submitted,

*Office of the State Comptroller
Division of Local Government
and School Accountability*



State of New York Office of the State Comptroller

EXECUTIVE SUMMARY

Campus security has long been an important issue for students and their families. To address this concern, in 1990, Congress enacted the Crime Awareness and Campus Security Act (Clery Act) requiring colleges to maintain and disclose crime statistics and security policies. The federal statute is named for Jeanne Clery, a 19-year-old Lehigh University freshman who was raped and murdered in her campus residence hall in 1986. As a result of the Clery Act, information about the safety and security of college communities, including both crime and fire data, is readily available to the public to help people make informed decisions when choosing a college for educational or employment purposes.

The Clery Act requires all public and private colleges participating in Federal Title IV student financial aid programs to prepare, publish and distribute an Annual Security Report (ASR) disclosing information about college safety policies, procedures and crime statistics.¹ The statistics include criminal homicide, sexual offenses, robbery, aggravated assault, burglary, arson, motor vehicle theft, liquor law and drug violations, illegal weapons possession and hate crimes. Colleges must disclose statistics for reported Clery Act crimes that occur on campus, on public property within or immediately adjacent to the campus, and in or on non-campus buildings or property that the college owns or controls.

Colleges must make the ASR available to current students and employees by October 1 of each year. Colleges must also inform current and prospective students and employees of the availability of the report and provide the ASR upon request. Additionally, colleges must maintain and make publicly available a daily crime log and must submit crime statistics to the United States Department of Education (DOE) annually. DOE's Handbook for Campus Safety and Security Reporting (Handbook) assists colleges in complying with Clery Act requirements.

Scope and Objective

The objective of our audit was to assess community colleges' compliance with safety reporting requirements established under the Clery Act for the period January 1 through December 31, 2013. Our audit addressed the following question:

- Are community colleges accurately reporting crime statistics and publishing other relevant security and safety-related information?

¹ For Clery Act-reporting purposes, crime statistics can include certain violations of law that are not routinely considered "crimes" for traditional law enforcement purposes, such as violations for possession of marijuana.

Audit Results

We audited five community colleges comprising: Fulton Montgomery Community College (Fulton), Genesee County Community College (Genesee), Herkimer County Community College (Herkimer), Niagara County Community College (Niagara) and Rockland Community College (Rockland). Although we found the colleges have taken steps to report crime statistics and publish other relevant security and safety-related information, they could do more to ensure the information is complete, accurately reported and made available to enrolled students and employees.

We found that none of the community colleges fully complied with the Clery Act by publishing all of the required campus security policy and procedure statements or meeting all of the required reporting requirements. Each college is required to publish an ASR that contains 62 disclosures. We categorized the disclosures into 14 policy and procedure statements and five reporting requirements. The five community colleges' ASRs lacked between four (21 percent) and 16 (84 percent) of the required statements or reporting requirements.

We found each of the colleges had inaccurately reported crimes in its ASR and to DOE. Further, Herkimer and Niagara published ASRs with crime statistics that did not match the statistics they reported to DOE. Fulton also could not support it had distributed the ASR in accordance with the law.

Because the colleges have not complied with Clery Act requirements, current and prospective students and employees may not have the information they need to make informed enrollment or employment decisions to ensure their safety.

Comments of College Officials

The results of our audit and recommendations have been discussed with college officials and their comments, which appear in Appendix B, have been considered in preparing this report.

Introduction

Background

The Clery Act requires all public and private colleges participating in Federal Title IV student financial aid programs to prepare, publish and distribute an Annual Security Report (ASR) disclosing information about college safety policies, procedures and crime statistics. The statistics include criminal homicide, sexual offenses, robbery, aggravated assault, burglary, arson, motor vehicle theft, liquor law and drug violations, illegal weapons possession and hate crimes. Colleges must disclose statistics for reported Clery Act crimes that occur on campus, on public property within or immediately adjacent to the campus, and in or on non-campus buildings or property that the college owns or controls.

Colleges must make the ASR available to current students and employees annually by October 1. Colleges must also inform current and prospective students and employees of the availability of the report and provide the ASR upon request. Additionally, colleges must maintain and make publicly available a daily crime log and must submit crime statistics to the United States Department of Education (DOE) annually. DOE's Handbook for Campus Safety and Security Reporting (Handbook) assists colleges in complying with Clery Act requirements.

The State University of New York system (SUNY) includes 30 community colleges that are located throughout the State.² Each SUNY college is primarily responsible for its compliance with applicable safety and security laws, including the Clery Act. The College's Security Director and his/her security team are responsible for responding to, addressing and reporting incidents that occur on campus, as well as incidents that involve enrolled students off campus.

We audited five community colleges,³ Fulton, Genesee, Herkimer, Niagara and Rockland, located throughout the State to determine whether community colleges accurately reported and published campus crime statistics and relevant security and safety-related information during the period January 1 through December 31, 2013. Figure 1 provides relevant statistics for these community colleges.

² <http://www.suny.edu/hr/cc/>

³ Except for Rockland, each community college had on-campus housing.

Figure 1: Community College Statistics				
Community College	Annual State Resident Tuition	Student Population	Student Housing Beds	Faculty and Staff
Fulton	\$3,598	2,781	288	251
Genesee	\$3,700	7,114	389	407
Herkimer	\$3,740	3,214	625	179
Niagara	\$3,888	6,630	428	110
Rockland	\$4,175	7,651	0	450

Objective

The objective of our audit was to assess community colleges’ compliance with safety reporting requirements established under the Clery Act. Our audit addressed the following question:

- Are community colleges accurately reporting crime statistics and publishing other relevant security and safety-related information?

Scope and Methodology

For the period January 1 through December 31, 2013, we interviewed college officials, reviewed campus policies and procedures, reviewed the Handbook distributed by DOE to assist colleges in complying with Clery Act requirements, reviewed crime statistics reports, and compared the colleges’ ASRs to crime statistics they reported to DOE.

We conducted our audit in accordance with generally accepted government auditing standards (GAGAS). More information on such standards and the methodology used in performing this audit is included in Appendix C of this report.

Comments of College Officials

The results of our audit and recommendations have been discussed with college officials and their comments, which appear in Appendix B, have been considered in preparing this report.

Annual Security Report and Supporting Records

Accessibility and reliability of information relating to criminal activities and safety concerns are important factors families consider when they select an institution of higher education. The Clery Act requires all public and private colleges participating in Federal Title IV student financial aid programs to prepare and publish an ASR disclosing information about college safety policies and procedures and crime statistics for the three most recent calendar years, based on definitions from the DOE's Handbook. Additionally, colleges are required to submit crime statistics to DOE annually.

Colleges can do more to ensure their crime statistics are accurately reported. The five colleges' ASRs lacked between four (21 percent) and 16 (84 percent) of the Clery Act's required statements or reporting requirements. All colleges also inaccurately reported their crime statistics on their ASRs. We also found that two colleges' ASRs did not match the statistics reported to DOE. Further, two colleges could not support that they had distributed their ASRs to faculty and students, as required. Because of this inaccurate or incomplete information, current and prospective students and employees may not have the information they need to make informed enrollment or employment decisions to ensure their safety.

Incomplete Annual Security Report

The Clery Act requires colleges to disclose their policy and procedure statements and reporting requirements in their ASRs. The report should be written in language that will be understood by the public and accurately reflect the college's current procedures and practices. The Handbook states the failure to have a required policy or to disclose all of the required policy statements means the college does not comply with the law.

The Clery Act requires 62 disclosures in the ASR, which we categorized into 14 policy and procedure statements and five reporting requirements. DOE published a Handbook that provides colleges with detailed ASR requirements and guidance on how to prepare the report. We compared these requirements to the statements and reporting requirements included in or associated with the colleges' ASRs. None of the ASRs we examined met the minimum Clery Act reporting requirements and, therefore, the colleges have not complied with the law. The five colleges' ASRs lacked between four (21 percent) and 16 (84 percent) of the 19 required statements or reporting requirements. For example:

- Fulton’s ASR did not meet 16 requirements. For example, it did not provide a statement that described the type and frequency of programs designed to inform students and employees about campus security procedures and practices held. In addition, we could not determine if officials distributed the ASR, as required, because they did not maintain records to support their ASR distributions.
- Genesee’s ASR did not meet four requirements. For example, it did not include the required statement regarding the disclosure of disciplinary proceeding results.

Appendix A details the Clery policy and procedure statements and reporting requirements, and the areas in which each college is noncompliant.

Inaccurate Crime Reporting

Each year, colleges must review their crime log(s), internal incident reports and crime statistics obtained from local police agencies to identify Clery reportable crimes. The ASR crime statistics should report crimes by crime categories and geographic location. Crime categories may include drug abuse arrests, alcohol disciplinary actions, sex offenses, burglary, etc. The geographic categories may include on-campus, on-campus housing, public property or off-campus location. To assist postsecondary institutions in understanding and meeting the various reporting requirements, DOE publishes a Handbook to help ensure that those involved in complying with the law and monitoring compliance are on the same page.

All of the colleges we visited, to some degree, inaccurately reported their crime statistics. For example, DOE directs colleges to report offenses that are violations of the law, not violations of school policy. Although Niagara, Genesee, and Herkimer have a policy that prohibits on-campus alcohol consumption, if the person consuming the alcohol is at least 21 years of age, it is not a violation of law. However, Genesee, Herkimer and Niagara report all violations of their alcohol consumption policy, even when the person consuming the alcohol is of legal age. Figure 2 identifies the alcohol violation reporting errors we identified.

Figure 2: Alcohol Violation Reporting Errors

Community College	Underreported	Overreported	Could Not Determine
Fulton	2		
Genesee	8		
Herkimer		24	12
Niagara			85

In addition, we identified the following crime reporting errors:

- Fulton reported a drug abuse arrest as a liquor law violation arrest, and improperly classified a campus drug abuse arrest and two drug abuse disciplinary incidents.
- Genesee overreported three student housing drug arrests and one housing weapons violation, underreported eight drug-related disciplinary actions and did not report an aggravated assault and a burglary.
- Herkimer should have reported all reported on-campus housing crimes as on-campus crimes and – as a subset of these crimes – as on-campus housing crimes. However, it only reported the crimes as on-campus housing crimes.
- Niagara misclassified all on-campus housing crimes as off-campus crimes and erroneously reported a rape twice.
- Rockland reported an additional drug arrest, liquor arrest and a liquor disciplinary action. However, officials had no records to support these crimes occurred.

Inconsistent ASR and DOE Crime Statistics

Although community colleges are required to publish an ASR and distribute it to all current students and employees, they are not required to send their ASR to DOE. However, a college must send DOE the crime statistics from the report. DOE posts the data on its public website for use by higher education consumers.

To confirm the colleges’ 2013 ASR crime statistics were consistent with the crime statistics they submitted to DOE, we compared the 2013 ASR crime statistics to the statistics DOE published online. We found the statistics did not always match. Specifically, we found:

- Herkimer’s ASR crime statistics do not identify which crimes were reported as occurring in its on-campus housing, as required; however, DOE crime statistics do.
- Fulton’s ASR report has one on-campus housing sex offense and one off-campus sex offense. However, DOE statistics report two on-campus housing sex offenses. The ASR also reports seven on-campus housing drug abuse arrests and one on-campus liquor law violation arrest. However, DOE crime statistics report one on-campus and two on-campus housing drug arrests, and one on-campus liquor law violation arrest.

**Annual Security Report
Distribution**

All colleges must distribute their ASR to all currently enrolled students⁴ and all employees by October 1 each year. Colleges also must provide the report to any prospective student or prospective employee upon request. A college can distribute the ASR through two methods:

- Giving a copy of the ASR directly to each individual or by direct-mailing the report to each individual through: the United States Postal Service, campus mail, email, or a combination of these methods.
- Posting the ASR on an Internet or intranet website that is reasonably accessible to enrolled students and current employees.

We found two colleges could not support they distributed the ASR, as required. Specifically,

- Rockland distributed its ASR by posting it on the Internet. However, we found that the ASR Rockland uploaded was incomplete and did not include all crime statistics it reported to DOE. College officials attributed the missing crime statistic information to a recent update to their website.
- Fulton officials said they distributed the ASR by emailing students and employees regarding the report’s availability on the Internet. However, Fulton could not provide a copy of this email, so we could not confirm if it complied with the ASR distribution requirements.

⁴ Includes those attending less than full-time and those not enrolled in Title IV programs or courses.

We also found that, while Herkimer distributed a copy of its ASR to the student body and employees, it also posted the ASR on its Internet homepage. However, Herkimer’s ASR homepage link provided access to an old ASR and not the 2013 report. Although the 2013 ASR could be found on Herkimer’s website, it erroneously labeled the report as a “Fire Safety Report” and not the 2013 ASR.⁵

The Clery Act requires colleges and universities to disclose their security policies, publish an annual crime report and provide timely warning to students and campus employees. When an educational institution provides inaccurate or incomplete information, current and prospective students and employees may not have the information they need to make informed enrollment or employment decisions to ensure their safety.

Incomplete Crime Log

The Clery Act requires colleges that have a campus police or security department – regardless of whether it is public or private – to have a written crime log that can be easily understood. The crime log must be made available to the public. The Clery Act also mandates specific categories of information that must be included in the crime log, such as the general location of the crime. For example, the location might be recorded as “on the second floor of the administration building” rather than “on-campus.” The log is designed to disclose crime information on a timelier basis than the annual statistical disclosures and must be updated within two days.

To confirm the colleges maintained a crime log in accordance with the Clery Act, we reviewed the colleges’ crime logs and all incident reports for the year 2013. While we found that each of the colleges we visited maintained a crime log, the crime logs often did not meet the Clery Act’s requirements. For example, we found 18 instances in Fulton’s crime log where it did not identify the location of the reported crime. We also found that Genesee’s and Niagara’s crime logs did not include reported crimes for their on-campus housing complexes. Both colleges maintained separate housing crime logs. We also found three gaps and eight duplicate log entry numbers in Rockland’s crime log. Generally, officials attributed these errors to human error.

When an educational institution provides incomplete information, current and prospective students and employees may not have the information they need to make informed enrollment or employment decisions to ensure their safety.

⁵ After bringing this to the College Administration’s attention, they promptly updated the website.

Recommendations

College officials should:

1. Include all required policy and procedure statements and reporting requirements in the college's ASR to comply with the annual security reporting requirements.
2. Ensure all Clery reportable crimes, appropriate crime categories and geographic locations are included and used when reporting crime statistics in the ASR.
3. Ensure the college's ASR crime statistics are consistent with the crimes reported to DOE.
4. Ensure the ASR is distributed in accordance with the Clery Act.
5. Include all alleged criminal incidents in the college's crime log, including incidents occurring in on-campus housing. College officials should ensure that the crime log includes details of crime locations.

APPENDIX A

SUPPLEMENTAL INFORMATION

Figure 3: Missing and Incomplete Procedure Statements and Reporting Requirements					
Clery Requirements	County Community College				
	Fulton	Genesee	Herkimer	Niagara	Rockland
Policy and Procedure Statement^a					
Crime Reporting Policy	I		I	M	
Campus Facility Security Policy	I		M		
Campus Law Enforcement/Authority Policy	I	I	I	I	I
Program to Inform of Security Procedures and Practices for Students and Employees	M		M		
Program on Crime Prevention	M				M
Monitoring and Recording Criminal Activity at Off Campus Locations	M	M			
Alcohol Policy	I				I
Drug Policy	I				I
Drug or Alcohol Abuse Programs	M	I	M		I
Disclosure of Disciplinary Proceeding Results	M	M	M	M	M
Emergency Response and Evacuation Program	I		I	I	
Sexual Assault Prevention Programs and Procedures	I		I	I	I
Registered Sex Offenders	M				
Missing Student	M		I	I	
Reporting Requirement^a					
Crime Statistics Reporting	I			I	I
Crime Location Reporting					
Hate Crime Reporting	M			I	
Disciplinary Referral Reporting					
Annual Security Reporting	Can Not Determine			I	
^a I= Incomplete; M= Missing					

APPENDIX B

RESPONSES FROM COLLEGE OFFICIALS

We provided a draft copy of this global report to the five community colleges we audited and requested a response from each college. We received a response from four community colleges, including Genesee, Herkimer, Niagara and Rockland.

College officials generally agreed with our findings and recommendations. The following comments were excerpted from responses received. Each college's individual report includes the college's response to our audit of the college.

Genesee Community College: "...We can assure you that the recommendations suggested in this audit have been or will be fully implemented so as to be fully in compliance with the Clery Act... Going forward the College will utilize both the Handbook of Campus Crime reporting issued by the Department of Education in 2011 and the Clery Compliance checklist developed by SUNY to ensure that all policy and procedure statements required by the Clery Act are contained in the College's ASR in a comprehensive manner..."

Herkimer County Community College: "...As we continue to identify opportunities for improving the safety and security operations within our College, we have and will continue to make corrective actions as identified in this "global" draft audit of the community colleges, especially as it relates to Herkimer County Community College. We will also use this global draft to implement current best practices and recommendations made as a result of the global draft Safety Report..."

Niagara County Community College: "...A written directive, dated October 17, 2014, was received from the Department of Education stating NCCC's housing should be categorized as 'on campus housing.' That stated, on page three of the draft Community College Safety Report, there is a paragraph that reads: 'Because the colleges have not complied with the Clery Act requirements, current and prospective students and employees may not have the information they need to make informed enrollment or employment decisions to ensure their safety.' We believe that minor technical compliance issues with Clery does not mean that our campus is not safe..."

OSC Response:

Our audit report does not state that, due to the college's noncompliance with the Clery reporting requirements, the college is not safe. It does report that college ASRs we examined were incomplete and did not contain all of the reporting components colleges must report in their ASR. The Department of Education has deemed this information to be important, and it must be shared with all current and prospective students and employees who may use this information when they make enrollment and employment decisions.

Rockland County Community College:

“...The College is committed to complying fully with the Clery Act. The Draft Report describes certain limited instances where the College inadvertently did not follow the technical requirements of the Clery Act and related regulations promulgated by the DOE. In the limited cases where we did not comply with the Clery Act, we have already taken steps to address the issues raised in the Draft Report...The College has taken the audit and related findings very seriously. We are very proud that our campus offers a very safe learning and working environment for our students and employees....”.

APPENDIX C

AUDIT METHODOLOGY AND STANDARDS

To complete our objective, we visited five county community colleges to determine if the colleges were accurately reporting crime statistics and publishing relevant security and safety-related information from January 1, 2013 through December 31, 2013. To complete the audit objective, we:

- Reviewed the Handbook distributed by DOE to assist colleges in complying with Clery Act requirements.
- Interviewed appropriate College officials.
- Reviewed internal reports, crime statistics documentation provided by local law enforcement agencies and crime logs, and reports generated by the local police agencies.
- Reviewed campus policies and procedures.
- Assessed the completeness and accuracy of the colleges' ASRs by comparing the crime statistics listed in the colleges' 2013 ASRs with those listed on DOE's Office of Postsecondary Education website.

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

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