



D. STAFFORD
& ASSOCIATES

Madison Area Technical College Workshop 2025

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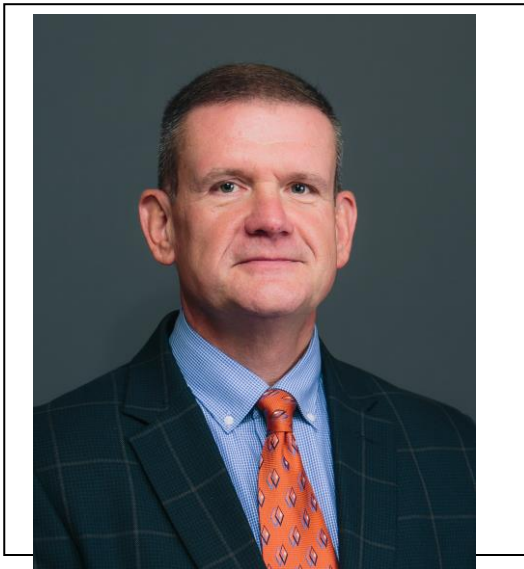
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William (Bill) Lafferty **Director, Regulatory Compliance and Public Safety Services**



Bill Lafferty retired from active service in Law Enforcement and Public Safety after 35 years of experience and with over 25 years of experience within Higher Education. He began his career with the U.S. Air Force as a Security Police Specialist. During his military service, he worked his way up through the ranks and performed a variety of specialized duties within the law enforcement and security field. These duties included patrol officer duties, patrol supervision, crime prevention programming coordinator, asset and resource protection specialist, and a quality assurance reviewer. Bill was also instrumental in implementing an Air Force Anti-Terrorism response plan and protocol during his tenure.

After the Air Force, Bill joined the public safety team at Villanova University where he performed duties as a Patrol Sergeant, Shift Lieutenant, Assistant Director of Housing Security, and Associate Director of patrol and investigatory operations. After nearly seven years at Villanova, Bill left to become the Director of Public Safety at Gettysburg College. Bill served 20 years at Gettysburg College, completing his career there as the Assistant Vice President of College Life. Bill's responsibilities included: direct strategic management oversight of all public safety operations; sexual and relationship violence response and investigation policy and protocol development; emergency operations management; life and fire safety; behavioral threat assessment; the oversight of institutional Clery Act and Title IX compliance requirements for the college; and during his tenure with Gettysburg, he managed student life development areas including: Greek Life, Student Activities, Experiential Education, and Student Conduct.

Bill went full-time with the National Association of Clery Compliance Officers and Professionals (NACCOP) and D. Stafford & Associates (DSA) in October of 2021, continuing his service as the Director of Federal Relations for NACCOP and serving as the Director, Regulatory Compliance and Public Safety Services for DSA. In his role with DSA, Bill will continue his work as an instructor of the Clery Compliance classes, including the Clery Academy and the Advanced Clery Academy, and teaching for the DSA Procedural Justice Training Institute. Bill will also serve as a team member in conducting Clery Act Audits and Assessments, Procedural Justice Assessments, and Organizational Assessments of campus police and public safety agencies.

Bill has served as the Director of Federal Relations with NACCOP since May of 2016. In this role, Bill is responsible for monitoring key public policy issues facing institutions of higher education, with a particular focus on those that impact the Clery Act. Bill is NACCOP's representative to federal agencies, Congress and



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other associations regarding NACCOP's views and legislative priorities within the higher education community, public safety, and beyond. Bill has also served as an Associate of D. Stafford & Associates since 2016 as well, teaching classes and participating in Clery Act Audits and Assessments.

Bill is a graduate of Eastern University, where he earned a Bachelor's Degree in Organizational Development, and Villanova University, where he earned a Master's Degree in Criminal Justice Administration. Bill was certified as a NACCOP Clery Compliance Officer (CCO) as part of the program's first cohort in July of 2017. Bill previously served a two-year term as President for the Northeast Colleges and Universities Security Association (NECUSA).



CLERY ACT

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The Impact of the New Administration in Washington on Compliance

Bill Lafferty

*Director, Regulatory Compliance & Public Safety Services,
D. Stafford & Associates*

Director of Federal Relations, NACCOP

Email: blafferty@naccop.org



Compliance in a New and Challenging Environment



Even in times of shifting priorities and national uncertainty, our commitment to Clery, Title IX, and Title VI remains unwavering. We lead not because we must—but because our students, faculty, and communities deserve nothing less.



NACCOP Federal Relations Strategic Goals



Federal Government Outreach and Collaboration

Collaborative Engagement with Peer Associations & Professional Organizations

Advance NACCOP's Legislative Interests

Provide Legislative Specific Education & Training



Federal Relations Outreach/ Engagement



- HELP Committee
- House Committee on Education and the Workforce
- Title IX Regs and OCR
- ED Clery Group
- Engagement with Peer Associations
 - NASPA
 - IACLEA
 - CUPA-HR
 - ACE
 - NECUSA
 - ASCA
- Legislative Newsletters
 - At least semiannual
- Legislative Update Webinars
 - Semiannual
- Federal Relations NACCOP Committee
 - 60 Committee Members
 - Planning Subcommittee
 - At least one Meeting/Semester
 - Annual Conference Breakout Session
 - Thinktank for NACCOP Leadership Team
 - Title IX NPRM
 - OCR meeting in DC
 - Focus groups
 - Conference presentations
 - Practitioner issues for Congress
 - Antihazing Legislation feedback



Potential Title IX, Title VI, and Clery Act Implications of Reported Harassment and Discrimination



Title IX

Title IX of the education amendment of 1972 is an antidiscrimination law prohibiting discrimination on the basis of sex that may exclude someone from participation in educational programs, deny them the benefits of an educational program or subject them to discrimination under any educational program or activity receiving federal aid.

Title VI

Title VI of the civil rights act of 1964 prevents discrimination based on race, color, or national origin, including shared ancestry or ethnic characteristics.

ED OCR - DEAR COLLEAGUE LETTER RESOLVING TITLE VI COMPLAINTS



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

THE ASSISTANT SECRETARY

May 7, 2024

Dear Colleague:

I write to share information about federal civil rights obligations of schools and other recipients of federal financial assistance from the U.S. Department of Education (Department) to ensure nondiscrimination based on race, color, or national origin, including shared ancestry or ethnic characteristics, under Title VI of the Civil Rights Act of 1964 and its implementing regulations (Title VI). These protections extend to students and school community members who are or are perceived because of their shared ancestry or ethnic characteristics to be Jewish, Israeli, Muslim, Arab, Sikh, South Asian, Hindu, Palestinian, or any other faith or ancestry. This guidance responds to recent increases in complaints filed with the Department's Office for Civil Rights (OCR) alleging discrimination on these bases in schools serving students in preschool through grade 12 and colleges and universities,¹ and public reports of such discrimination. To be clear, Title VI's protections against discrimination based on race, color, and national origin encompass antisemitism and other forms of discrimination when based on shared ancestry or ethnic characteristics. OCR vigorously enforces these protections.

This guidance includes examples to help schools carry out Title VI's requirements.² These examples are illustrative and do not dictate the outcome of any particular matter OCR may investigate; rather, in each case, OCR engages in an individualized analysis of the particular facts at issue.

The contents of this guidance do not have the force and effect of law and do not bind the public or create new legal standards. This document is designed to provide clarity to the public regarding existing legal requirements under Title VI. The Department has determined that this

ED FSA – ELECTRONIC ANNOUNCEMENT

<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-06-26/reminder-institution-responsibilities-under-clery-act>

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(GENERAL-24-78) Reminder – Institution Responsibilities under the Clery Act

Print

POSTED DATE: June 26, 2024
AUTHOR: Federal Student Aid
ELECTRONIC ANNOUNCEMENT ID: GENERAL-24-78
SUBJECT: Reminder – Institution Responsibilities under the Clery Act

The U.S. Department of Education (the Department) understands that students need a safe and supportive learning environment if they are to achieve their educational goals and full potential. Institutions and the Department have a shared responsibility to support campus safety initiatives. A key part of the Department's role is ensuring compliance with the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act)* requirements. This is an opportune time to remind institutions about some of the key provisions of the *Clery Act*. Specifically, in light of recent events on some campuses, this Electronic Announcement reminds institutions of the *Clery Act* provisions that relate to the effective management of protests, demonstrations, and other events, whether approved or unapproved by your institution, that may affect overall campus safety. In addition, the Department has taken note of media reports about incidents of arson, aggravated assaults, and other crimes reportable under the *Clery Act* occurring adjacent to recent campus protests and demonstrations. The Department is also aware that many institutions annually review and update their campus safety policies and procedures after the conclusion of their spring academic term and in time for implementation at the start of the next academic year.

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ED FSA – DEAR COLLEAGUE LETTER

<https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2024-07-29/voluntary-disclosure-hate-crime-sub-categories>

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(GEN-24-09) Voluntary Disclosure of Hate Crime Sub-Categories

Print

PUBLICATION DATE: July 29, 2024
DCL ID: GEN-24-09
SUBJECT: Voluntary Disclosure of Hate Crime Sub-Categories

SUMMARY: Institutions may provide additional information about hate crimes to members of their campus communities.

Dear Colleague:

In view of heightened concerns about acts of hate on campuses, the U.S. Department of Education (the Department) remains committed to tracking information about hate crimes, pursuant to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics (*Clery Act*). Having accurate data enhances the ability of governments, campuses, and communities to effectively respond to acts of hate and ensure that all students are safe on campus.

Toward that end, the Department reminds institutions that they may voluntarily provide information about hate crimes to members of their campus communities, beyond what the *Clery Act* requires to be reported. Specifically, they may voluntarily provide the sub-categories of persons and groups who were targeted based on their actual or perceived membership in a covered bias category.

Although not required, the Department encourages institutions to consider providing this information to students, employees, and other stakeholders. Specifically, the Federal Bureau of Investigation's (FBI's) Hate Crime Statistics Data Collection identifies sub-categories that institutions can use if they choose to voluntarily provide such additional information separate and apart from their obligations under the *Clery Act*. The list of sub-categories is published in the FBI's Hate Crime Data Collection Guidelines and Training Manual available online at -<https://le.fbi.gov/file-repository/hate-crime-data-collection-guidelines-and-training-manual.pdf/view> and included for reference below.

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New Antihazing Law Amends the Clery Act (December 23, 2024)



New Administration Higher Ed Focus



- Title IX - partnering with DOJ OCR - transgender athletes, DEI
 - 2024 regulations vacated
 - May 2020 regulations active
 - Prioritizes due process and institutional discretion
 - Framed as restoring **fairness and legal protections** for accused students.
- Title VI - partnering with DOJ OCR - selective enforcement
 - Anti CRT stance
 - Title VI tools used selectively; minimal focus on proactive civil rights enforcement compared to previous administrations
 - Limited proactive actions - cultural emphasis
 - Heavy emphasis on Antisemitism related incidents



New Administration Higher ED Focus



- Clery Act
 - Suspended and later rescinded the **2016 Clery Act Handbook**, replacing it in 2020 with a **streamlined guidance document**
 - Less rigorous guidance moving forward
 - Strict adherence to the statute and implementing regulations
 - Greater flexibility for institutions
 - Emphasizes **institutional discretion** over prescriptive guidance

ED OCR DEAR COLLEAGUE LETTER – ANNOUNCING 2024 TITLE IX RULE WAS VACATED



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

THE ACTING ASSISTANT SECRETARY

February 4, 2025

Dear Colleague:

This letter¹ is to clarify that, in light of a recent court decision, the United States Department of Education's (ED) Office for Civil Rights (OCR) will enforce Title IX under the provisions of the 2020 Title IX Rule,² rather than the 2024 Title IX Rule.³ Accordingly, lawful Title IX enforcement includes, *inter alia*, the definition of sexual harassment, the procedural protections owed to complainants and respondents, the provision of supportive measures to complainants, and school-level reporting processes as outlined in the 2020 Title IX Rule.

■ <https://www.ed.gov/media/document/title-ix-enforcement-directive-dcl>

ED Updates – New Administration

- Secretary McMahon: Our Department's Final Mission (March 3, 2025)
- U.S. Department of Education Initiates Reduction in Force (March 11, 2025)
 - RIF of 50% of ED's workforce
- "Dear Education Stakeholders" Letter from Acting Under Secretary (March 14, 2025)
 - Strategic cuts/returning education to the States
- Executive Order: Improving Education Outcomes by Empowering Parents, States, and Communities (March 20, 2025)
 - Announcing the closure of ED to the extent permitted by law
- NACCOP News Release (March 21, 2025)



ED Inquiries Related to Potential Title VI Violations



The screenshot shows the U.S. Department of Education website. The header includes the department's name, navigation links for Español, Data, Research, and Contact Us, and a search bar. A teal navigation bar contains links for Higher Ed, Adult Programs, Birth to Grade 12 Education, Teaching & Admin, Grants & Programs, and Laws & Policy. The main content area features a breadcrumb trail: HOME / ABOUT US / NEWSROOM / PRESS RELEASES. Below this is a 'PRESS RELEASE' section with the headline: 'U.S. Department of Education's Office for Civil Rights Sends Letters to 60 Universities Under Investigation for Antisemitic Discrimination and Harassment'. The text of the release begins: 'Letters warn of potential enforcement actions if institutions do not fulfill their obligations under Title VI of the Civil Rights Act to protect Jewish students on campus.'

<https://www.ed.gov/about/news/press-release/us-department-of-educations-office-civil-rights-sends-letters-60-universities-under-investigation-antisemitic-discrimination-and-harassment>



Protests and Encampments as Evidence of Discrimination



Northwestern University among original five institutions under DOE investigation

The department previously [announced on Feb. 3](#) that it was launching investigations into five higher education institutions, including Northwestern University, "where widespread antisemitic harassment has been reported."

Craig Trainor, acting assistant secretary for the department's Civil Rights Office, cited the universities' 2024 pro-Palestinian [student encampments](#) as evidence of the harassment in the press release. The release also referenced President Donald Trump's executive order, [Additional Measures to Combat Anti-Semitism](#), in which the president demanded colleges and universities "protect American Jews to the same extent to which all other American citizens are protected."



Proposed Bill to Abolish ED



A Bill to Kill the Education Department Is Already Filed. Here's What It Says

Trump's election has breathed new life into a longtime conservative cause

By Brooke Schultz — November 25, 2024 6 min read



People walk outside the U.S. Capitol building in Washington, June 5, 2022. Legislation has been introduced in the Senate to abolish the Department of Education.
— Patrick Semansky/AP

Trump Advisers Weigh Plan to Dismantle Education Department

Administration officials are discussing executive order that could shut down key functions of the agency

By Matt Barnum, Liz Esley Whyte and Ken Thomas
Feb. 3, 2025 3:25 pm ET





Restoring Civility on Campus Act (S. 4760)



JULY 24, 2024

Ernst, Cassidy Introduce Bill Forcing Universities, Biden Admin to Combat Antisemitism

Last year, antisemitic incidents on college campuses increased by 700 percent.

WASHINGTON – Today, U.S. Senators Joni Ernst (R-Iowa) and Bill Cassidy (R-La.) introduced the *Restoring Civility on Campus Act* to require universities and the Department of Education to immediately address civil rights complaints if a student experiences violence or harassment on campus because of their heritage.

<https://www.ernst.senate.gov/news/press-releases/ernst-cassidy-introduce-bill-forcing-universities-biden-admin-to-combat-antisemitism>

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Restoring Civility on Campus Act



- Requires immediate OCR investigation on complaints alleging discrimination based on ancestry or ethnicity
- Increases transparency for students who report antisemitism
- Ensures accurate reporting of hate-motivated crimes and strengthens OCR enforcement of Title VI
 - Requires ED to conduct ASR Audits
 - Increase fines for failure to disclose crimes motivated by antisemitism
 - From \$71,545 to \$1M per violation

<https://www.congress.gov/bill/118th-congress/senate-bill/4760/cosponsors>



Restoring Civility on Campus Act



- Improves accountability over university and agency officials by:
 - Requiring ED staff to process the expedited evaluation of OCR complaints
 - Requiring the president or chancellor of the institution to meet with OCR investigators
- Requires ED to issue a public report on OCR cases involving alleged discrimination on the basis of shared ancestry or ethnic characteristics
 - 30 days following the opening of the case
 - The report also must be updated every 30 days for the following two years.

**What about
Implementing
Regulations and
Guidance?**





ED Guidance Related to SCHA Amendment to the Clery Act



- Dear Colleague Letter - in the works - anticipated distribution **“soon”**
- June 2025 ED meeting with associations, organizations and advocacy groups
- Areas requiring additional guidance addressed during ED meeting:
 - Timing and required elements of **ASR policy statements**
 - Integration of **transparency requirements**
 - Requirements for **disclosure of investigative protocols**
- Expectations for **prevention programming**
- Training standards for **adjudicators and investigators**
- Reporting of **co-occurring crimes with hazing**
- How to define **hazing** in institutional policies
- Clarification on the **definition of a student**
- Other Clery Act implementation considerations



The Stop Campus Hazing Act (SCHA)

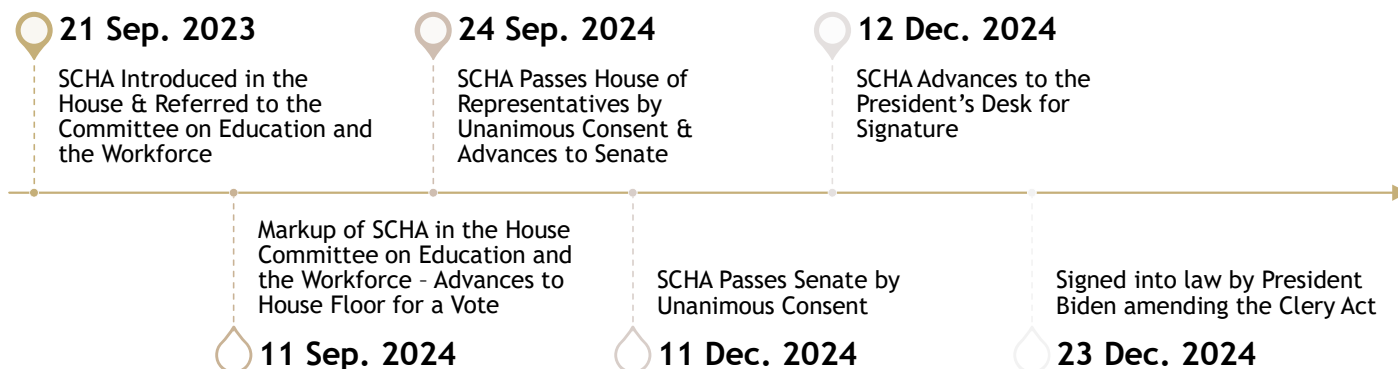
Bill Lafferty

*Director, Regulatory Compliance & Public Safety Services,
D. Stafford & Associates*

Director of Federal Relations, NACCOP



Setting the Stage - Legislative Timeline



From	To
Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act	Jeanne Clery Campus Safety Act

NAME CHANGE



Hazing Experiences



55% involved in clubs, teams, and organizations experience hazing

25% occurred on-campus

95% of cases where students identified the behaviors as hazing were not reported

25% of coaches or advisors were aware of the hazing behaviors

69% of students in an organization knew of hazing activities in a different organization

For over half of the hazing incidents, a group members posted on social media

Activities Experiencing At Least One Hazing Behavior

1. Varsity Athletic Teams
2. Social Fraternity or Sorority
3. Club Sports
4. Performing Arts Organizations
5. Service Fraternity or Sorority
6. Intramural Team
7. Recreation Club
8. Other
 1. Includes religiously-affiliated organizations, culture clubs and organizations, and student government.
9. Academic Club
10. Honor Society



Impetus Behind Federal Anti-Hazing Legislation



Provide

- Provide a clearer understanding of Hazing prevalence on campuses

Create

- Create a culture of reporting among students & employees

Hold

- Hold IHEs accountable for naming & responding appropriately to Hazing reports

Make

- Make Hazing education, awareness & prevention a priority at all IHEs



Clery Act Crimes



Primary Crimes

- Murder/Non-negligent Manslaughter
- Manslaughter by Negligence
- Sexual Assault (Rape, Fondling, Incest & Statutory Rape)
- Robbery
- Aggravated Assault
- Burglary
- Motor Vehicle Theft
- Arson

VAWA Offenses

- Dating Violence
- Domestic Violence
- Stalking

Arrests and Referrals for Disciplinary Action

- Liquor Law Violations
- Drug Law Violations
- Weapon Law Violations

Hate Crimes

- All primary crimes (except Manslaughter by Negligence)
- Larceny-Theft
- Simple Assault
- Intimidation
- Destruction/Vandalism/Damage of Property

Hazing



Sources of Crime Definitions



- FBI UCR Summary Reporting System (SRS) User Manual
 - Murder; Manslaughter by Negligence; Rape; Robbery; Aggravated Assault; Burglary, Motor Vehicle Theft; Arson; Weapons: Carrying, Possessing, Etc.; Drug Abuse Violations; and Liquor Law Violations
- FBI UCR National Incident-Based Reporting System (NIBRS) Data Collection Guidelines
 - Fondling, Incest, and Statutory Rape



Sources of Crime Definitions



- FBI Uniform Crime Reporting Hate Crime Data Collection Guidelines and Training Manual
 - Hate Crimes (Larceny-Theft, Simple Assault, Intimidation, Destruction/Damage/Vandalism of Property)
- ED Clery Act Regulations at 34 CFR §668.46(a)
 - Dating Violence, Domestic Violence, and Stalking
- 20 U.S.C. §1092(f)(6)(A)(vi) Jeanne Clery Campus Safety Act - Hazing

Note: Although the law states the institutions must use the UCR Program definitions, Clery Act crime reporting does not have to meet all of the other UCR Program Standards.



Potential Title IX, Title VI, and Clery Act Implications of a Reported Hazing Incident



Title IX

Title IX of the education amendment of 1972 is an antidiscrimination law prohibiting discrimination on the basis of sex that may exclude someone from participation in educational programs, deny them the benefits of an educational program or subject them to discrimination under any educational program or activity receiving federal aid.

Title VI

Title VI of the civil rights act of 1964 prevents discrimination based on race, color, or national origin, including shared ancestry or ethnic characteristics.



Stop Campus Hazing Act



Hazing incidents
included in ASR

New ASR policy
statements

Establish
standardized
definition of Hazing

Establish campus-
wide evidenced-
informed prevention
education

Require Campus
Hazing Transparency
Report



Standardized Definition of Hazing

- The term “hazing”, for purposes of reporting statistics on hazing incidents means; any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons), against another person or persons regardless of the willingness of such other person or persons to participate, that-
 - is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and
 - causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including-



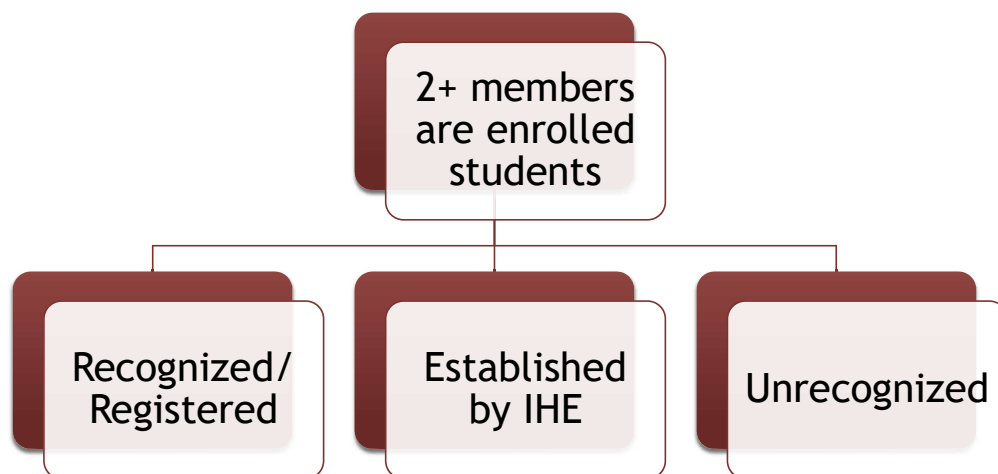
Physical or Psychological Injury

- whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
- causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
- causing coercing, or otherwise inducing another person to perform sexual acts;
- any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
- any activity against another person that includes a criminal violation of local, State, Tribal or Federal law; and
- any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

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DEFINITION OF STUDENT ORGANIZATION – CRIME STATISTICS

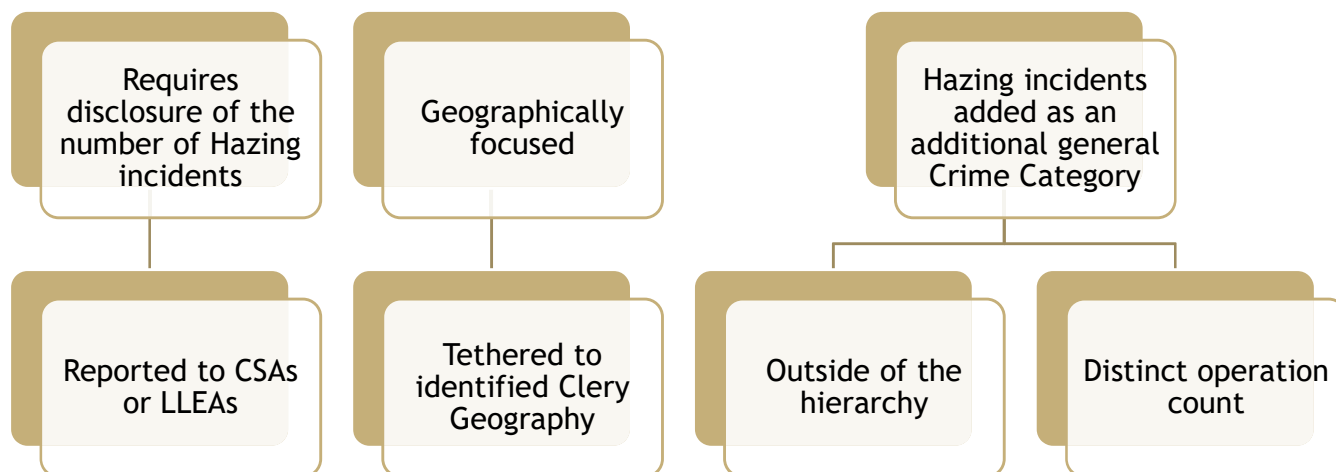


Examples

- Registered student organizations
- Social fraternities and Sororities
- Service Fraternities and Sororities
- Intramural sports
- Recreational/Club sports groups
- Performing arts groups
- Honor societies
- Military groups
- Marching band/Choir
- Athletics teams
 - Team subgroups - (i.e. Lineman or Quarterbacks groups)
- Student government
- Residence hall groups
- Unrecognized groups
 - Suspended
 - Banned
 - Derecognized
 - Secret Societies (both recognized and unrecognized)



Hazing Incidents Included in ASR





Other Clery Act Compliance Considerations



Daily Crime Log

Timely Warning

Emergency
Notification

Requesting
Hazing statistics
from LLE
(for 2025 CY)

Educate Key
CSAs



Summary of TW vs. EN



	Timely Warning (TW)	Emergency Notification (EN)
Legal Standard:	Potential ongoing or serious threat	Immediate threat to health and safety
Circumstances:	Clery-reportable crimes that have been reported (occurred in past)	Clery-reportable crimes as well as other types of emergencies (happening right now or about to happen)
Audience:	Community-wide	Can send to a segment of the community, if appropriate
When Issued:	As soon as pertinent information is available	Upon confirmation of emergency (when possible)
Follow-Up:	Not Required	Required



Educating CSAs on New Requirements

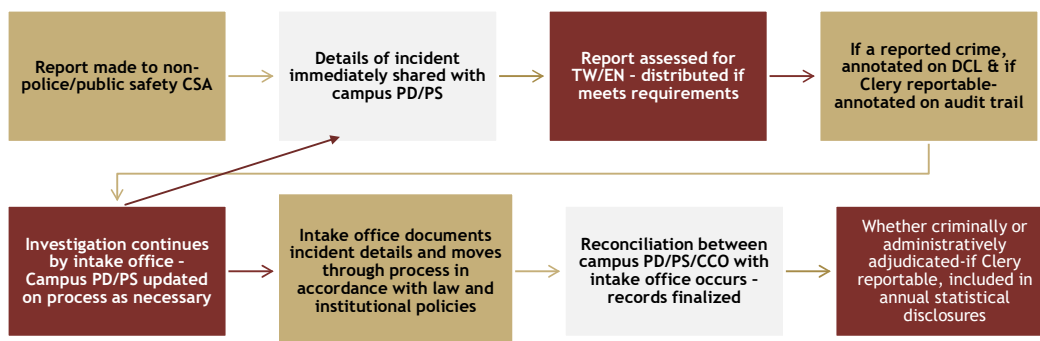


Special Consideration:

- Staff liaisons/advisors to associated student organizations/clubs (like SGA, band, Athletics, Recreation Sports, Rodeo Team, Academic Clubs, etc.)
- Student Conduct
- Athletics Leadership and Coaches
- Student Engagement
- Residence Life
- Greek Life
- Title IX
- Primary Report Writers/Investigators - campus police/security, resident assistants, etc.



REPORTS MADE TO NON-POLICE/PUBLIC SAFETY CSAs





Primary Report Writers/ Preferred Receivers of Reports



Campus Police/Public Safety

Security Officers/Contract Security Officers

Title IX Coordinators/Investigators

External Investigators

Student Conduct Officer

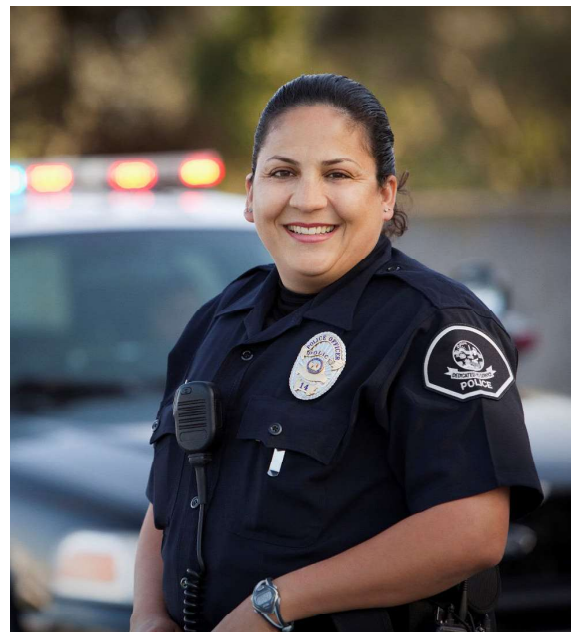
Human Resources

Residence Life Professional and Student Staff

Student Engagement/Greek Life Professional Staff

COLLECT AND ASSESS CRIME REPORTS PROPERLY

■ *"The Department [of Education] must emphasize that the proper classification of an incident is not in any regard dependent on the label that a victim or witness uses to describe it. Rather, a competent institutional official with the requisite knowledge and experience must evaluate the available information and determine the crime classification(s) that apply to the particular set of case facts" (University of Saint Thomas FPRD, 2017, p. 10).*





Capturing the Right Information

- Remember, reports need to facilitate determining:
 - Whether a Clery-reportable crime has been reported; and
 - Whether the reported crime occurred on or within the institution's Clery Geography.

“CSA crime reports should include sufficient detail, such as dates and locations, and, where appropriate, personally identifying information, including name and contact information if available.” (2016 Handbook, p. 4-10)

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Hazing – Key Questions



- What behavior(s)/conduct occurred; describe?
- What group or persons were involved?
- Details of the alleged misconduct including;
 - Date and time(line), places, circumstances, witnesses, and available corroborating evidence.
 - Emails, text messages, photos, social media posts
- How did it happen?
- How did this experience make you feel?
- Was there physical/sexual contact? Describe it.
- Effect of the alleged conduct on the reporting party and others. How did this conduct make them feel?
 - Physical or psychological harm

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Campus Hazing Transparency Report



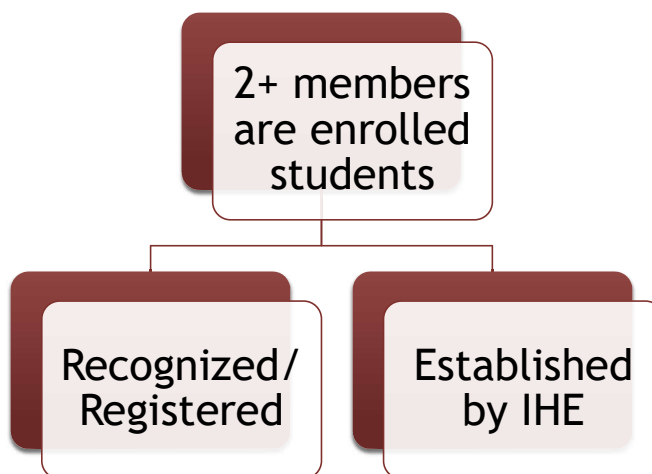
Intended to disclose incidents of Hazing for which student organizations have been found responsible for violating the institution's standards of conduct addressing Hazing



Entries concerning findings made to the CHTR must stay in the report (i.e., on the website) for 5 years

Standard Clery Act record retention requirements still apply

DEFINITION OF STUDENT ORGANIZATION - CHTR



Campus Hazing Transparency Report

- For each included incident:
 - Name of student organization
 - General description of the violation
 - Whether hazing involved the abuse or illegal use of alcohol or drugs
 - Key Dates
 - Incident
 - Start of investigation
 - End of investigation (determination of responsibility)
 - Outcome notification to student organization
 - Findings (rationale) for the determination of responsibility
 - Sanctions imposed

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Campus Hazing Transparency Report



Do not include Personally Identifiable Information (PII)

Publish in prominent location on public website

Webpage will include:

- ✓ Statement notifying public of annual availability of hazing statistics
- ✓ Information related to institutional policies related to hazing
- ✓ Applicable local State, and Tribal laws on hazing
- ✓ Information required for the Campus Hazing Transparency Report

Campus Hazing Transparency Report

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- An institution is not required to:
 - Develop the Campus Hazing Transparency Report until the institution has a finding of a hazing violation
 - Update the Campus Hazing Transparency Report if the institution does not have a finding of a hazing violation for that period of time

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Campus Hazing Transparency Report

- The report may include:
 - Other information determined by the institution to be necessary; or
 - Reported as required by State law

Note: Must meet the minimum requirements of the Campus Hazing Transparency Report as outlined within the Federal law

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Sample Transparency Report



Student Organization: Varsity Football Team

Description of Violation: New members were forced to consume alcoholic beverages and ingest other harmful liquids as part of new member initiation activities.

Were Alcohol and/or Drugs Involved: Yes

Date Incident Occurred: August 23, 2025

Date Investigation Initiated: August 26, 2025

Date Investigation Ended with a Finding: September 2, 2025

Date Organization Notified of Hazing Violation: September 3, 2025

Findings or Rationale of Institution: Senior leaders of the Football team were found to have violated the institution's Hazing policy by distributing alcohol to minors and creating an unsafe environment through the compulsory ingestion of harmful liquids.

Sanctions Placed on Organization: Football Team Suspended for remainder of 2025 season

Campus-wide Prevention Education Program

Hazing definition as defined by the institution

A review of how reports of Hazing can be made and to whom, the response and the process for investigation

Primary prevention strategies to stop Hazing, may include:

Bystander intervention
Ethical Leadership
Strategies for building group cohesion

Include information on applicable local, State, and Tribal laws on Hazing

Hazing Prevention Education & Awareness Programming



Primary Prevention Strategies



- Bystander Intervention - prevention strategy that focuses on building awareness and developing skills to step in and confront risky behavior
- Discuss campus resources
- Ethical Leadership
 - Institutional and Organizational Core Values
 - Unpack the hazing culture
 - Build ethical traditions - team-building retreats, mentorship pairing, service projects, etc.



Implementation of Prevention and Education Programming



- Incorporate into CSA training
- Be prepared to begin educating students upon their arrival in Fall of 2025
- Establish ongoing training for student groups/organizations (at least annually)
- Establish ongoing education for remaining students, faculty and staff (at least annually)
 - Primary prevention education (onboarding)
 - Annual refresher education and awareness



Specialized Training



- Develop a training and education program for investigators and decision-makers
 - Ensure a comprehensive review of all Clery compliance requirements and disclosures
 - Create a clear understanding of the institution's policy along with conduct that violates that policy
 - Outline investigative preparation, timeline, and organization
 - Writing an investigative report to include potential evidence, credibility assessment, and findings
- Provide an understanding of the cultures of the groups that exist on campus
- Initiate case study reviews as practical application of investigative inquiry

Required ASR Policy Statements

- A statement of current **policies** relating to Hazing (as defined by the institution)
 - Include information within policy statement
 - How to report incidents
 - Process used to investigate incidents of Hazing
 - Information on applicable local, State, and Tribal laws on Hazing

Required ASR Policy Statements

- A statement of policy regarding **prevention and awareness programs** related to Hazing (as defined by the institution)
 - Include information related to prevention and awareness programming
 - Description of research-informed campus-wide prevention programs for students, staff, and faculty:
 - How to report, process for investigation, jurisdictional laws
 - Primary prevention strategies to stop hazing, such as:
 - Bystander intervention
 - Ethical leadership
 - Strategies for building group cohesion



Institutional Hazing Policy Components



- Purpose and Scope of Policy
- Definition of Hazing
 - Start with Federal Definition
 - Consider elements within respective jurisdictional laws - local, State or Tribal laws on Hazing
- Definition of a Student Organization (For Compliance with the CHTR)
- To whom reports should be made
- Definition of the CHTR and the categories for disclosure
- Maintaining a public website in a prominent location for CHTR disclosures
- Prevention and awareness programming*
- The institutional response to those reports
- Information regarding applicable local, State, and Tribal laws on hazing (as defined by such local, State, and Tribal laws)



Summary Differences of SCHA Disclosure Requirements



	Crime Statistics and Policy Statement Disclosures	Campus Hazing Transparency Report (CHTR)
What	Include Hazing incidents meeting the Federal definition reported to a CSA or LLE	Include Hazing incidents reported to a CSA that result in a finding violating the institution's Hazing policy
By Whom	Registered, recognized, established or unrecognized student organizations	Registered, recognized, or established student organizations
Geography	Clery Geography	Any location the institution's Hazing policy has jurisdiction
How to Count	Distinct incident count	Organizations found responsible count based on distinct investigations (could involve multiple separate incidents in a single report)
Special Reporting Considerations	Not subject to hierarchy rule. Therefore, count other co-occurring Clery crimes	Not required to develop until there is a finding of Hazing
Where Disclosed	Annual Security Report and to ED via the CSSDACT	Detailed report located prominently on institution's website
Policy Disclosures	Statement of current policies related to Hazing & prevention and awareness programs	• Statement notifying public of annual availability of hazing statistics • Information related to institutional policies related to hazing; • Applicable local State, & Tribal laws on hazing

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Clery Compliance Committee/ Antihazing Working Group Agenda Topics - Antihazing

Addressing Antihazing Updates to the Clery Act -
Implementation Timeline

Clery Statistical and Policy Statement Requirements

CHTR Requirements and Responsibilities

Institutional Hazing Policy Promulgation & Antihazing
Educational Programming and Implementation Plan

Managing Hazing Reports and Investigations - Who and How

Recognition, Registration, Establishment Process for Student
Organizations

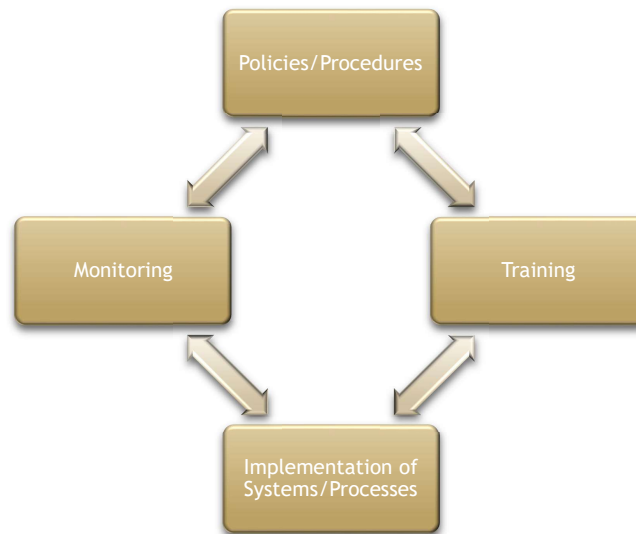
Sharing Information related to Hazing Reports

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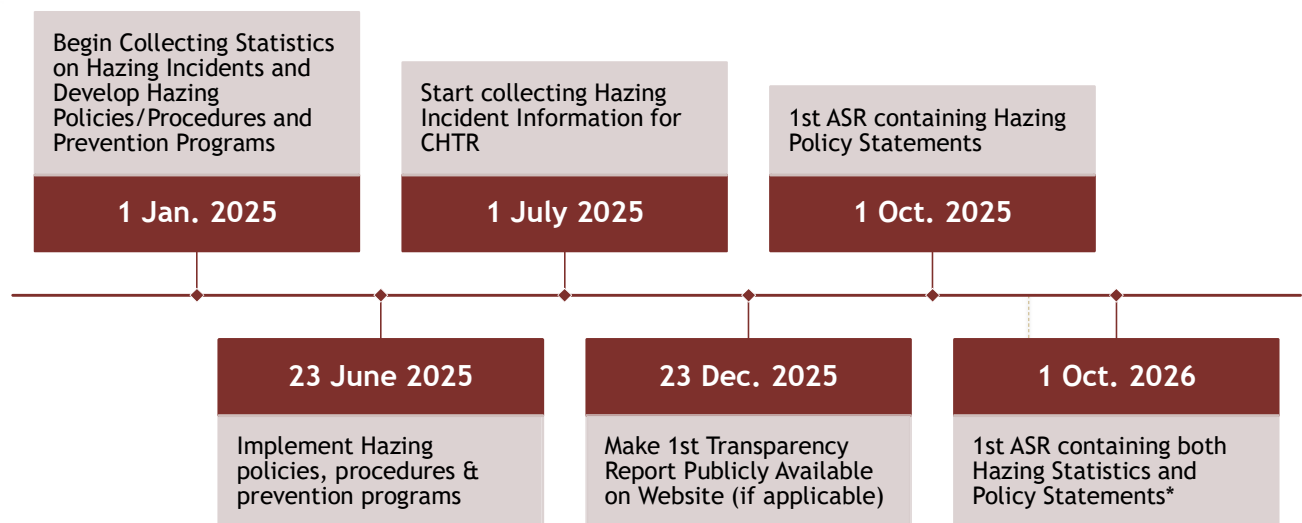
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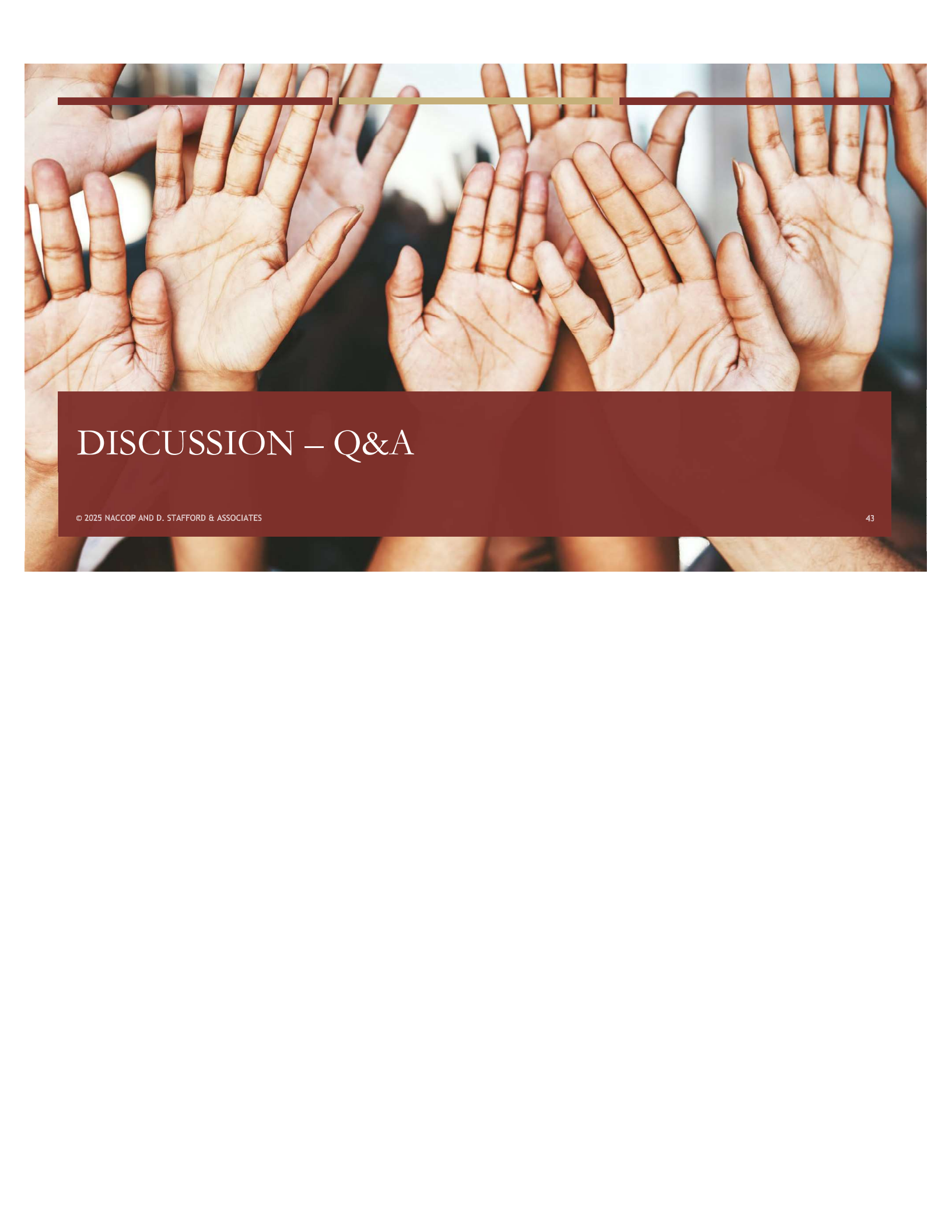


Internal Control Systems



Implementation Timeline





DISCUSSION – Q&A

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Tips, Tricks, and Traps in Managing the Daily Crime Log

Bill Lafferty

*Director, Regulatory Compliance & Public Safety Services,
D. Stafford & Associates*

Director of Federal Relations, NACCOP

EMAIL: blafferty@naccop.org



Daily Crime Log Requirement



Any institution, regardless of whether it's public or private, that has a campus police or security department, **must** create, maintain, and make available a Daily Crime Log.

It doesn't matter if your security staff is paid by your institution or by a contractor, or if you have one security officer or a police department. Any of these arrangements put your institution in the category of "having a security department."



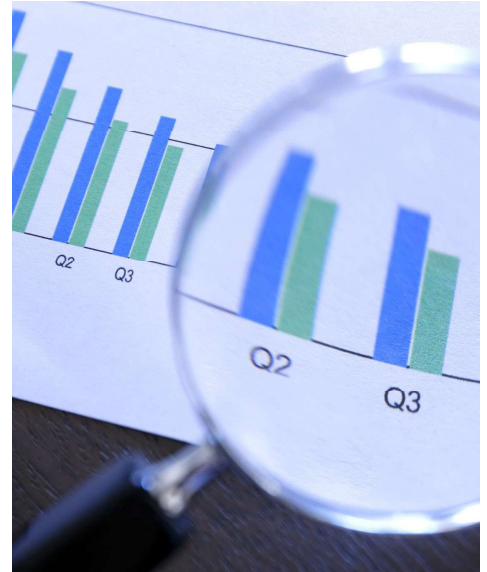
ED “Top Ten” Program Review Findings



1. ASR Production Deficiencies
2. ASR Distribution/Notification Violations
3. Omitted/Inadequate Information Disclosures (VAWA)
4. Misclassification/Compilation of Crime Statistics
- 5. Impaired Administrative Capability**
6. ASR/CSSDACT Discrepancies
7. Timely Warning/Emergency Notification Violations
8. CSA Violations
- 9. Crime Log Deficiencies**
10. “Clery Geography” Violations

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Finding #8: Failure to Maintain an Accurate and Complete DCL



Failure to Enter Incidents Reported to the LUPD - Over the course of the review period, ED found that certain reported crimes that occurred in LUPD’s patrol zone were completely undocumented in the daily crime log. The following two incidents are examples of this deficiency.

LUPD Incident #16-1301 (Rape)⁸⁴ – The crime associated with this report constituted a rape that occurred in the LUPD’s patrol zone and was omitted from the daily crime log.

LUPD Incident #17-0500 (Stalking)⁸⁵ – The crime associated with this report constituted an incident of stalking that occurred in the LUPD’s patrol zone and was omitted from the daily crime log.

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(FPRD, 2024, pp.69-70)

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Finding #8: Failure to Maintain an Accurate and Complete DCL



Failure to Enter All Offenses Associated with a Reported Incident:

LUPD Incident #16-0174 (Fondling, Dating Violence)⁸⁶ – The crimes associated with this report constituted a fondling incident as well as dating violence. Liberty should have entered the two distinct crimes of fondling and dating violence. While the reference to sexual battery is acceptable, in that this description can include the act of fondling as defined under Federal law, Liberty failed to include an entry for dating violence.

LUPD Incident #16-1288 (Fondling, Dating Violence) – The crimes associated with this report constituted a fondling incident as well as dating violence. Liberty should have entered the two distinct crimes of fondling and dating violence. While the reference to sexual battery is acceptable, in that this description can include the act of fondling as defined under Federal law, Liberty failed to include an entry for dating violence.

LUPD Incident #19-02750 (Rape) – The incident associated with this report constituted a rape that occurred in the LUPD's patrol zone. The incident also involved the crime of dating violence. Liberty should have documented the two distinct crimes of rape and dating violence in the daily crime log, and it failed to document dating violence.



Finding #8: Failure to Maintain an Accurate and Complete DCL



- Improper use of the “Informational” Classification
 - ED found LUPD “Informational” reports that contained documentation of crimes that should have been entered on the DCL.

LUPD Incident #16-1382 (Informational)⁸⁷ – The incident associated with this report constituted a motor vehicle theft that occurred in the LUPD's patrol zone. The crime is not entered in the daily crime log.

LUPD Incident #20-01612 (Informational) – The incident associated with this report constituted an alleged rape that was committed by a former Liberty President in the LUPD's patrol zone. The crime is not entered in the daily crime log.



Finding #8: Failure to Maintain an Accurate and Complete DCL

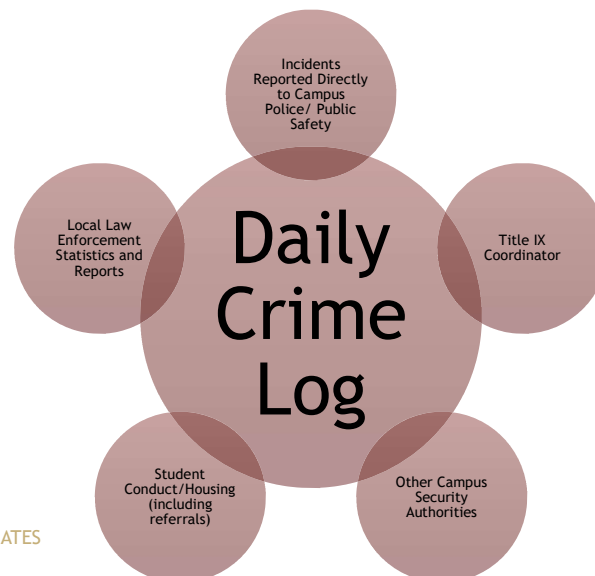


The following chart summarizes the identified violations:

Calendar Year	Total Daily Crime Log Entries	Omitted Daily Crime Log Entries ⁹²	Entries Containing One or More Errors/Omissions
2016	497	101	242
2017	529	226	228
2018	451	121	318
2019	381	30	336
2020	420	104	305
2021	502	295	205
2022	664	571	92
2023	228	4	223
Totals	3,672	1,452	1,949

93% of the required line items in Liberty's daily crime logs were deficient or missing during the review period

Sources of DCL Entries



Statutory Requirement

- “All entries that are required pursuant to this paragraph shall, except where disclosure of such information is prohibited by law or such disclosure would jeopardize the confidentiality of the victim, be open to public inspection within two business days of the initial report being made to the department or a campus security authority.”

[20 U.S.C. 1092\(f\)\(4\)\(B\)\(i\)](#)



Required Crime Log Elements



Tips

- Include all Required Elements:
 - Nature of the Crime (Classification)
 - General Location
 - Date and Time Occurred
 - Date Reported
 - Disposition

Tricks

- Additional Helpful Element: Case Number
- Timing of Entries
- Withholding Information
- Denoting Clery Crimes when populating the log based on the state crime code



Daily Crime Log: What Should be Included?



Tips

- Capture all criminal incidents
- “All” includes citations
- Do not include non-criminal activities/incidents

Tricks

- The report’s classification does not always tell the whole story
- Hierarchy Rule
- Number of criminal offenses (e.g., “Underage Possession of Alcohol (x2)”)



Other Crime Log Considerations



1

Include crime log instructions

- On a paper copy and, if applicable, the website.

2

Make sure the crime log does not include non-criminal incidents.

3

Clearly identify the crime log as the “Daily Crime Log”

- “Daily Crime and Fire Log” if combined with the Fire Log.



Crime Log Sample



Stafford College Police Department Daily Crime Log

Date Reported	Date/Time Occurred	Incident/ Case #	General Location of Crime	Nature of Crime	Disposition
4/01/2024	4/01/2024 - Approximately 11:30PM	2024-1073	Stafford Student Union Building	Simple Assault – Domestic Violence	OPEN: Under Investigation by Campus PD
4/05/2024	4/03/2024 - 4:00PM	2024-1074	Tyler Residence Hall	Burglary	CLOSED: No Suspects or Witnesses
4/07/2024	4/05/2024 - 10:25PM	CSA Report #112	West Campus Apartments	Sex Offenses - Fondling	CLOSED: CSA Report from Title IX
4/14/2024	4/14/2024 – 6:30PM	2024-1075	Football Stadium Parking Lot	Underage Possession (x4)	CLOSED by Arrest (x 1); Referred for Disciplinary Action (x 3)
5/05/2024	5/04/2024 – 11:50PM	2024-1076	Campus Library	Larceny – theft of backpack	OPEN: Under Investigation by Campus PD



Not This!



Stafford College Police Department Daily Crime Log

Date Reported	Date/Time Occurred	Incident/ Case #	General Location of Crime	Nature of Crime	Disposition
4/01/2024	4/01/2024 - Approximately 11:30PM	2024-1073	Stafford Student Union Building	Simple Assault – Domestic Violence	OPEN: Under Investigation by Campus PD
4/03/2024	4/03/2024 - 4:00PM	2024-1074	Tyler Residence Hall	Motorist Assist	CLOSED
4/07/2024	4/07/2024 - 10:25PM	2024-1074	West Campus Apartments	Medical Emergency	CLOSED
4/14/2024	4/14/2024 – 6:30PM	2024-1075	Football Stadium Parking Lot	Suspicious Activity	OPEN: Under Investigation
5/01/2024	5/01/2024 – 8:05AM	2024-1075	Campus Library	Informational	CLOSED
5/15/2024	5/15/2024	2024-1075	Admissions Parking Lot	Suspicious Person	CLOSED



Daily Crime Log: What Should be Included? -TRAPS



Failing to add
crimes reported to
Title IX
Coordinators

Failing to add
crimes reported to
Student
Conduct/Res Life

Failing to add
crimes reported to
Other CSAs

Failing to add
crimes reported to
Local LE

Traffic Violations
and the Crime Log

Failing to add all
crimes and
Subsequent Reports
from Investigative
Follow-up



Daily Crime Log: PSU Audit

- Clery Act crimes reported to non-police CSAs must be promptly reported to campus police/public safety for inclusion in the crime log.
 - *...we note that Penn State's interpretation would create a perverse incentive for institutions to steer students and others to report crimes to officials outside the campus police department to avoid having to list those crimes in the log. It would also mean that the crime log would be unreliable and irreconcilable with the institution's publicly-available crime statistics. Such an approach is inconsistent with the purpose and proper administration of the Clery Act. (Penn State Campus Crime Final Program Review Determination, 2016, p.26).*

DAILY CRIME LOG GEOGRAPHY TIPS

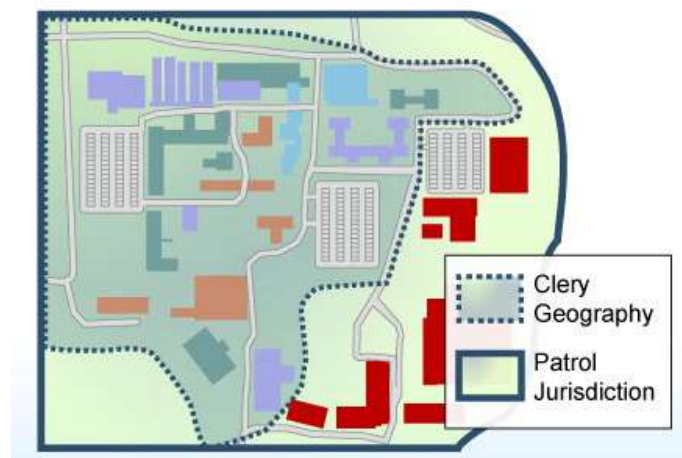
- Include crimes that occur in all Clery Geographic Areas
 - On-Campus
 - On-Campus Student Housing Facilities
 - Noncampus
 - Public Property



Daily Crime Log: Geography TRAPS



- The Expanded Patrol Jurisdiction or Expanded Patrol Zone
- Reporting crimes off-campus and outside of the patrol jurisdiction





Daily Crime Log: Required Elements-TRAPS



Updating
Classifications

Use of
Abbreviations/State
Code References

Managing
Dispositions
(Open/Pending)

General Location
Specificity

Missing/Inaccurate
Information

Vague General
Locations



Planet
Princeton

Three Cases of Sexual Assault Reported to Princeton University Public Safety

by Krystal Knapp on December 17, 2014, 5:20 PM [0 Comments](#)

Three incidents of sexual assault were reported to the Department of Public Safety at Princeton University by school officials last weekend, according to the school's crime logs. Two of the assaults were at private eating clubs off campus.



A student reported that on Dec. 12 while at an unidentified eating club they were fondled without their consent.

A student reported that while at an unidentified eating club in November, they were fondled without their consent. The crime log lists the incident as taking place on Nov. 1.

A student believes that at some point during the 2012-13 academic year they were engaged in sexual activity while incapacitated.

All three cases are listed as open investigations in the crime logs, but Princeton University Spokesman Martin Mbugua said there are no active investigations at this time. Any such action would depend on the individual's preferences, he said.

**BEWARE OF
INACCURATE
DISPOSITIONS**

Other Advice

- Managing crimes that are found to not have been an actual crime
- Who backs up the primary keeper of the log?
- Making the Log Available
- Publicizing Availability
- Records Retention



Preparing the Daily Crime Log



Potential Pitfalls

- Are you attempting to automate the log?
- Are you certain ALL crimes are properly entered into the Records Management System (RMS)?
- Are there DCL omissions due to functionality issues of RMS?
(Multiple Crimes-One Report)

RMS Considerations

- Calls for service (CAD)
- Incident Reports
- Supplemental Reports
- Written Statements
- Field Interview Cards
- Other Scanned Documents

Unfounded Crimes-Crime Log

- If a crime report is determined to be unfounded, you must update the disposition of the complaint to unfounded in the crime log within two business days of that determination. You may not delete the report from the crime log.

Unfounded Crimes

-
- An institution may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situation where:
 - sworn or commissioned law enforcement personnel have fully investigated the reported crime and,
 - based on the results of this full investigation and evidence, have made a formal determination that the crime report is false or baseless and therefore “unfounded.”
 - Beginning with the reports due in 2015, institutions have been required to include in the Web-based survey and the annual security report statistics for the total number of crime reports that were “unfounded” and subsequently withheld from crime statistics during each of the three most recent calendar years.



Daily Crime Log - Unfounding



Stafford College Police Department Daily Crime Log

Date Reported	Date/Time Occurred	Incident/ Case #	General Location of Crime	Nature of Crime	Disposition
3/14/2024	Between 9:00AM on 3/12/2024 and 4:PM on 3/13/2024	2024-1071	Tyler Residence Hall	Burglary – theft of backpack from resident's room (UNFOUNDED)	OPEN: Under Investigation by UPD UPDATED and CLOSED on 3/18/2024 – UNFOUNDED – investigation revealed backpack was never stolen
3/28/2024	3/27/2024 – between 3:30PM and 8:30PM	2024-1072	Facilities Services Building Parking Area	Motor Vehicle Theft-theft of golfcart (UNFOUNDED)	OPEN: Under Investigation by UPD UPDATED and CLOSED on 4/01/2024 by UPD– Unfounded – Investigation revealed golfcart was misplaced and never stolen

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Handbook Guidance



“If a crime is reported and entered into the crime log but the resulting investigation shows that the initial description was inaccurate, you should update the description. Do not list the initially recorded crime as unfounded due to misclassification, or delete an entry once it has been made. Update the nature of the crime instead.”

(Handbook for Campus Safety and Security Reporting, 2016, p. 5-5)



Daily Crime Log - Misclassification



Stafford College Police Department Daily Crime Log

Date Reported	Date/Time Occurred	Incident/ Case #	General Location of Crime	Nature of Crime	Disposition
4/01/2024	4/01/2024 - Approximately 11:30PM	2024-1073	Stafford Student Union Building	Aggravated Assault (Simple Assault)	OPEN: Under Investigation by UPD UPDATED and CLOSED on 4/05/2024 – Incident originally misclassified. Further investigation revealed original incident was a Simple Assault.
4/05/2024	4/03/2024 – between 7:00PM and 8:30PM	2024-1074	DeBowes Academic Building-Faculty Office	Burglary (Theft)	OPEN: Under Investigation by UPD UPDATED and CLOSED on 4/06/2024 by UPD– Incident originally misclassified. Further investigation revealed original incident was a Theft.



Combined Crime and Fire Log



Stafford College Police Department Daily Crime and Fire Log

Date Reported	Date/Time Occurred	Incident/ Case #	General Location of Crime/Fire	Nature of Crime/Fire	Disposition
4/01/2024	4/01/2024 - Approximately 11:30PM	2024-1073	Stafford Student Union Building	Simple Assault – Domestic Violence	OPEN: Under Investigation by Campus PD
4/05/2024	4/03/2024 - 4:00PM	2024-1074	Tyler Residence Hall	Unintentional – Stove Top Grease Fire	N/A
4/07/2024	4/05/2024 - 10:25PM	2024-1075	West Campus Apartments	Intentional – suspect lit posterboard in first floor hallway on fire	N/A
4/07/2024	4/05/2024 - 10:25PM	2024-1075	West Campus Apartments	Arson – suspect lit posterboard in first floor hallway on fire	OPEN: Under Investigation by Campus Fire Marshall

Final Thoughts on Crime Logs

- Daily Crime Log WILL NOT always match your annual crime statistics.
- Develop a system to update the logs within 2 business days of a crime being reported, as required.
- Ensure the logs have complete, accurate entries and contain all required components.
- Use logs as part of your statistical reconciliation process.

Crime Log Management

- Develop a patrol/sector map to document patrol jurisdiction.
- Develop an internal policy that outlines crime and fire log maintenance.
 - Who populates the logs?
 - From what sources is information gathered for the logs?
 - Is there a back-up to prepare the log in the absence of the primary person?
 - Consider developing instructions for the consumer.
- Staff Training - Granting Access





NACCOP CLERY COMPLIANCE OFFICER CERTIFICATION PROGRAM

About the Program

The Clery Compliance Officer (CCO) Certification Program will provide candidates with the opportunity to immerse themselves in a comprehensive professional development program that leads to a professional credential from the only association serving the needs of Clery compliance officers and professionals.

Individual Benefits

- Achieve a professional-level credential
- Develop expertise in Clery Act compliance
- Become a leader in the field
- Learn how to develop an effective system to keep the institution in compliance
- Interact and network with other CCO Certification Program Candidates
- Prepare for growth and future advancement
- Participate in a rigorous combination of educational initiatives designed to prepare you to effectively lead your institution's Clery Act compliance program

Institutional Benefits

- Ensure that your staff has mastered essential concepts to effectively lead the institution's Clery Act compliance program
- Make a strategic investment in the professional development of your staff
- Mitigate the risk of noncompliance and its consequences (i.e. fines, negative media publicity, etc.)
- Provide your staff with a network of other credentialed practitioners
- Enhance administrative capacity to manage Clery Act compliance, as expected by the Department of Education

CCO Certification Program Pricing

NACCOP Members

\$2,800

(\$275 annual recertification fee* after successful completion)

NACCOP Non-members

\$3,800

(\$375 annual recertification fee* after successful completion)

The Certification Fee can be paid in one, two or three installments (see NACCOP website for details).

*Candidates who successfully earn the NACCOP CCO Certification will be required to complete several online classes each year to maintain the certification.

Apply for the NACCOP CCO Certification Program and other training programs at
www.NACCOP.org





ENHANCE YOUR KNOWLEDGE. PROTECT YOUR CAMPUS.

D. Stafford & Associates Services

- Clery Act Services: Independent Reviews of Clery Compliance, ASR Reviews, Training at Individual Campuses, and Assistance with Department of Education Audits
- Drug-Free Schools and Communities Act (DFSCA) Services: Review of Drug and Alcohol Abuse Prevention Program (DAAPP), DAAPP Disclosure Process, and Biennial Review
- Campus Police/Public Safety/Security Management Studies and Organizational Assessments
- Arming Assessments
- Physical Security and Vulnerability/Threat Assessments
- Expert Witness and Litigation Consultation
- Accreditation Assessments and Planning
- Behavioral Intervention Team/Threat Assessment Team Procedure Assessments and Training
- Active Shooter Training for Armed and Unarmed Agencies
- Title IX Services: Sexual Misconduct Policy Review or Development, Training at Individual Campuses, and Assistance with Office for Civil Rights Investigations
- Independent Civil Rights (Title IX) Investigations of Alleged Sexual Misconduct/Harassment
- Executive Searches for Chiefs and Directors of Campus Police/Public Safety Agencies
- Searches for Clery Compliance Officer/Director and Title IX Coordinator positions
- Interim Chief/Director Placement
- Part-Time Clery Compliance Consultant Service (DSA can provide a team member to serve as the CCO for your Institution)
- Community Policing and Sexual Assault Program Assessment and Training
- Emergency Response Training & Exercises
- Procedural Justice Assessments (www.campusproceduraljustice.com)

D. Stafford & Associates National Training Classes

- D. Stafford & Associates (DSA) Clery Act Compliance Training Academy (5 days)
 - DSA Advanced Clery Act Compliance Training Academy: Practical Application
 - Title IX Coordinator Classes—Multiple Tiers
 - Title IX Investigator Classes—Multiple Tiers
 - Behavioral Intervention/Threat Assessment Team Training
 - Behavioral Intervention/Threat Assessment Chair Training
- 🍁 DSA offers several training classes and other consulting services for Canadian institutions of higher education. Visit the Canadian Services Tab of the DSA website for more information.

Visit www.dstaffordandassociates.com
For additional information about DSA Services and/or Classes



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DSA TRAINING CLASSES

TIER 1: CLERY ACT COMPLIANCE TRAINING ACADEMY

This 5 day training academy is designed to be a comprehensive and intensive training experience. The Academy addresses all statutory and regulatory requirements of the Clery Act (including relevant sub-regulatory guidance provided by the U.S. Department of Education). The training academy experience will benefit individuals who have not had previous Clery Act training, as we start with the basics and work into more advanced concepts. The academy will also benefit those who want to enhance their knowledge of the law. The academy includes a significant amount of training in classifying crimes according to Clery Act definitions and standards. The academy features interactive instruction; group exercises; and use of an electronic testing system to reinforce the concepts learned. Each attendee is provided with electronic access to numerous forms and documents that will assist each attendee in developing a system for compliance at their institution.

BEHAVIORAL INTERVENTION/THREAT ASSESSMENT CLASSES

DSA offers two Behavioral Intervention Team (BIT)/Threat Assessment Team (TAT) Classes: one for BIT/TAT team members, and one for the chairperson of these teams.

To learn more about any DSA class, visit www.dstaffordandassociates.com/training



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TIER 2: ADVANCED CLERY ACT COMPLIANCE TRAINING ACADEMY: PRACTICAL APPLICATION

This training program provides an opportunity for attendees to build upon the foundation provided in the DSA Clery Act Compliance Training Academy through a combination of instruction, discussion, and group-based learning activities that explore how to practically apply relevant laws and ED guidance to some of the most vexing issues facing practitioners. Our Clery Academy Graduates love this class.

This experience is designed to be interactive, with attendees participating in group analysis and exercises throughout the class. Participants will be able to assess their ability to competently apply the law to specific scenarios and problems while evaluating pertinent operating procedures and practices that relate to complying with the Clery Act.

The class size is limited to 35 attendees to allow for a significant amount of interactive discussion and group exercises. Attendees must have successfully completed the DSA Clery Act Compliance Training Academy to be eligible to attend.

TITLE IX COORDINATOR AND INVESTIGATOR CLASSES

DSA offers a Title IX Coordinator track and a Title IX Investigator track with several Tiers (classes) in each track. Attendees can enroll in any classes that will assist them in performing their Title IX-related duties.

The DSA Title IX team has trained over 10,000 Title IX Coordinators, Investigators, Hearing Officers, and Advisors across the country and is well-known for delving into the practical application of Title IX. The DSA team is comprised of seasoned practitioners, and all have served as Title IX Coordinators/Deputy Coordinators and Investigators for institutions of higher education. As changes to the required processes are made by the Office for Civil Rights, those changes are immediately incorporated into all relevant DSA classes.

NACCOP

CLERY COMPLIANCE OFFICER CERTIFICATION PROGRAM

NACCOP offers a Clery Compliance Officer Certification Program (CCO Certification Program) for eligible employees of colleges and universities who want to benefit from NACCOP's unmatched practical expertise in leading and managing Clery.

The CCO Certification Program will provide participants with the opportunity to immerse themselves in a comprehensive professional development program that leads to a professional credential from the only association serving the needs of Clery compliance officers and professionals.

NACCOP FOUNDATIONS OF THE CLERY ACT CLASS

This 2 day training will provide a basic overview of the requirements of the Clery Act and is suited for people who are new to the Clery Act as well as those who have previously attended Clery Act training, as we continually update the curriculum to include new information received from the U.S. Department of Education based on our questions about practical application of the regulations and handbook.



To learn more about any of these NACCOP classes/programs, visit: www.naccop.org

NACCOP ONLINE VAWA ADJUDICATOR TRAINING PROGRAM

Officials involved in adjudicating student conduct and employee violations involving incidents of dating violence, domestic violence, sexual assault, and stalking are required to receive annual training. This program, developed by the National Association of Clery Compliance Officers and Professionals (NACCOP) will allow for these officials to participate in a low-cost, convenient training program to meet this requirement.

This online, self-paced training program provides participants with an affordable, convenient way to meet the VAWA annual training requirement. Institutions can purchase the training for several hundred dollars for up to 20 learners.



**Title IX Coordinators /
Investigators: Join the
NACCOP Title IX & Equity
Alliance!**

NATIONAL ASSOCIATION OF CLERY COMPLIANCE OFFICERS AND PROFESSIONALS

**Membership benefits include free or discounted
access to the following resources:**

- Professional Development
- Legislative Updates
- Clery Related Studies & Press Releases
- Tools for Managing Compliance Objectives
- Complimentary Copy of the Annual NACCOP Journal
- Resource Library
- Network with other Clery Compliance Officers
- 10 part Clery Act Webinar Series (Free)
- 8 Free Additional Webinars each Year
- Clery Compliance Officer Certification Program

Institutional Membership Cost:
\$475 (\$125 /additional person)

See website for Special Rates for Clery Committee Membership

Join today at www.NACCOP.org



ANNUAL NACCOP CONFERENCE

Held every July in Maryland (to ensure easy access for the U.S. Department of Education and other officials from the Federal Government).

Check the website for exact dates: www.naccop.org

This 3 day conference offers expert training and guidance each year on compliance with Federal Laws and Regulations pertaining to campus safety and security, including but not limited to:

- The Clery Act
- Violence Against Women Act
- The Drug Free Schools and Communities Act
- Title IX

Attendees of this conference are immersed in educational opportunities that will immediately assist them in practically applying the requirements of these laws and regulations to their individual campuses. The conference offers more than 20 educational sessions each year to provide attendees with the ability to pick compliance topics of interest.

Pre-Conference Workshops:

Each year, NACCOP offers intensive half-day and full-day workshops for Clery Compliance Officers, Title IX Coordinators, and DFSCA/Part 86 Coordinators. You must attend the conference in order to be eligible to attend one of the pre-conference workshops.

REGISTER TODAY at www.NACCOP.org