CAMPUS SAFETY & SECURITY HANDBOOK

Washington University of Virginia

2024

WUV's Campus Safety and Security Handbook is based on n the Handbook for Campus Safety and Security Reporting provided by the U.S. Department of Education U.S., Office of Postsecondary Education, The Handbook for Campus Safety and Security Reporting, Washington, D.C., 2016 (HSSR). (https://www2.ed.gov/admins/lead/safety/handbook.pdf).

INTRODUCTION

Choosing a postsecondary institution is a major decision for students and their families. Along with academic, financial and geographic considerations, the issue of campus safety is a vital concern. In 1990, Congress enacted the *Crime Awareness and Campus Security Act of 1990* (Title II of Public Law 101-542), which amended the *Higher Education Act of 1965 (HEA)*. This act required **all postsecondary institutions participating in HEA's Title IV student financial assistance programs** to disclose campus crime statistics and security information. The act was amended in 1992, 1998, 2000 and 2008.

The 1998 amendments renamed the law the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* in memory of a student who was slain in her dorm room in 1986. It is generally referred to as the *Clery Act* and is in section 485(f) of the HEA.

On March 7, 2013, the *Violence Against Women Reauthorization Act of 2013 (VAWA)* (Public Law 113-14) was signed into law. VAWA includes amendments to the *Clery Act.* (HRCC 1-1).

Currently WUV does not participate in Title IV student financial assistance programs and thus some of the requirements of the *Clery Act* do not apply to WUV. Nevertheless, WUV has adopted the laws and regulations of the *Clery Act* and VAWA to provide safe and secure academic environments for our students.

The *Clery Act*

The *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* or the *Clery Act* is a federal statute codified at 20 U.S.C. § 1092(f), with implementing regulations in the U.S. Code of Federal Regulations at 34 C.F.R. 668.46.

The *Clery Act* requires all colleges and universities that participate in federal financial aid programs to:

1) Publish an annual security report by October 1st that documents three calendar years of campus crime and fire statistics and certain campus security policy statements;
2) Collect, count, and disclose crime statistics and information about crime on and around their campuses;
3) Maintain a public daily crime log that records all criminal incidents and alleged criminal incidents reported to Safety and Security;
4) Issue "timely warning" notices to the campus community for any Clery crime that "represents an ongoing or continuing threat to the safety of students or employees";
5) Issue an emergency notification "when a significant emergency or dangerous situation involves an immediate threat to the health or safety of students or employees on campus."

The Annual Security Report is available October 1st of each year. This report includes statistics for the previous three years concerning reported crimes that occurred on-campus, and on public property within, or immediately adjacent to and accessible from, the campus. The report also includes College policies concerning campus security, such as sexual assault and other matters. A copy of this report is available by contacting Washington University of Virginia's Campus Safety Department or by accessing the following website: info@wuv.edu.

SECTION I: CLERY GEOGRAPHY

The *Clery Act* requires institutions to disclose statistics for reported crimes based on:

1) Where the crimes occurred,
2) To whom the crimes were reported,
3) The types of crimes that were reported, and
4) The year in which the crimes were reported.

WUV must disclose crime statistics for Clery-reportable offenses that occur only on its so-called "Clery Geography." Clery Geography includes three general categories:

1) On-campus: (1) Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institutions educational purposes, including residence halls; and (2) Any building or property that is within or reasonably contiguous* to the area identified in paragraph (1) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

2) Non-campus building or property: (1) Any building or property owned or controlled by a student organization that is officially recognized by the institution; or (2) Any building or property owned or controlled by an institution that is used in direct support of, or in relation, to, the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.
(Example of noncampus location: mixed-use apartment building; HRCC 2-24)

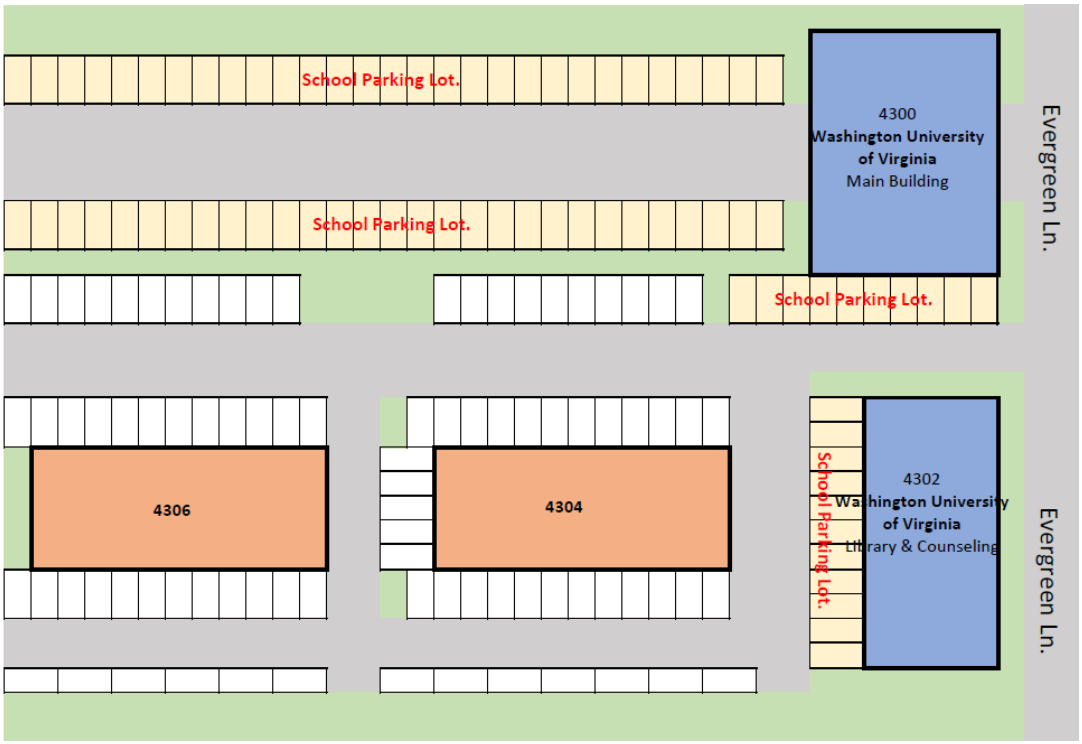
3) Public property: All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus. (Example of Public Property: sidewalk, street, sidewalk; HRCC 2-13; Example of public property: parking lot; HRCC 2-14; Example of public property: gated fence; HRCC 2-17)

***Reasonably contiguous** *refers to a building or property your institution owns or controls that's in a location that you and your students consider to be, and treat as, an integral part of your main or core campus; and is covered by the same security policies as your campus. An example might be a house two blocks from campus that's owned by your institution and has been converted into an art studio for your students* (HSSR, 2-3).

WUV is located at 4300 and 4302 Evergreen Lane, Annandale, VA. Both buildings are owned by WUV except the Unit #3 of 4302. There are eight units in 4302. Based on these three general categories, the Clery Geography of WUV, were determined to be on-campus. An overhead view of WUV can be seen in Figure 1.

Figure 1:


Little River Turnpike
Parking
No
Parking
Parking Lot
Parking Lot
Parking Lot
4302
Library &
Counseling Center
Washington University of Virginia
Evergreen Lane
4300
Main Building
WASHINGTON UNIVERSITY of VIRGINIA


School Parking Lot.
School Parking Lot.
School Parking Lot.
4300
Washington University
of Virginia
Main Building
Evergreen Ln.
4306
4304
School Parking Lot.
4302
Washington University
of Virginia
Library & Counseling
Evergreen Ln.

The Clery Geography of WUV is highlighted in yellow.

SECTION II: PHYSICAL SECURTY OF CAMPUS FACILITIES

A. Fire Alarm System

The fire alarm system monitors fire, heat, and smoke conditions twenty-four hours a day. In the event a fire alarm is activated, audible and visual (strobe) warning signals will be activated. The Annandale Fire Department responds to all activated fire alarms.

B. Video Surveillance and Video Management System

The College has numerous surveillance cameras located throughout the campus both on the interior and exterior of the building. Video data is captured and stored on a digital server for thirty (30) days. The cameras are used for both real time monitoring and after-action investigations via the recorded footage. The system is monitored and managed by the Campus Safety Department.

C. Access Code System

The College has an access control system in place for the high value interior offices. Staff and faculty are required to punch the access codes for entry to those areas.

D. Safety and Security Maintenance

Campus Safety Officers and the Facilities Maintenance Department routinely inspect the campus for unsafe conditions. Employees can request maintenance repairs by visiting info@wuv.edu. If a student or visitor discovers an unsafe condition, they should report it to a member of faculty, staff, or campus safety

E. First Aid

First aid kits are located at the Offices of Student Life and VP of Administration.

Frequently Asked Questions

Q: A student reported that he cut his arm in the lab. He wants to go to the emergency room. Will a Campus Safety Officer drive him there?

A: No. College employees are not authorized to transport anyone to the emergency room for treatment. Faculty should call 911 and ask EMS to respond. You should also notify Student Life Office or your Department Chair. After EMS evaluates the student, they can either agree to further medical services or refuse medical services. A copy of the refusal should be obtained, if possible, for the incident report.

Q: I have a headache does Student Life Office have any pain relievers?

A: No. Employees are not authorized to distribute over-the-counter medication.

Q: If I have a minor cut can I get a bandage from Student Life?

A: Yes. The Student Life Office maintains first aid supplies for minor injuries. Additionally, first aid boxes are located in Student Life Office and Finance Office (due to easy access).

SECTION III: TYPES OF CRIMINAL OFFENSES FOR THE *CLERY ACT*

The *Clery Act* requires your institution to include **four general categories** of crime statistics:
1) Criminal Offenses; 2) Hate Crimes; 3) VAWA Offenses; 4) Arrests and Referrals for Disciplinary Action for Weapons

CRIMINAL OFFENSES

Criminal Offenses refer to Criminal Homicide, including Murder and Non-negligent Manslaughter, and Manslaughter by Negligence; Sexual Assault, including Rape, Fondling, Incest and Statutory Rape; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; and Arson.

A. Criminal Homicide

These offenses are separated into two categories: Murder and Nonnegligent Manslaughter, and Negligent Manslaughter.

1) **Murder and Non-negligent Manslaughter** *is defined as the willful (non-negligent) killing of one human being by another.*[1] NOTE: Deaths caused by negligence, attempts to kill, assaults to kill, suicides, accidental deaths, and justifiable homicides are excluded.
2) **Negligent Manslaughter** *is defined as the killing of another person through gross negligence*.[2]*

**Gross negligence is the intentional failure to perform a manifest duty in reckless disregard of the consequences as affecting the life or property of another.*

*Examples of Murder by Non-Negligent Manslaughter (HCCR 3-5)

*Examples of Manslaughter by Negligence (HCCR 3-6)

B. Sex Assault (Sex Offenses)

Any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent. Include attempted Sexual Assaults, but do not include in your Clery Act statistics any Sexual Assaults other than the four types of Sexual Assaults described in this chapter.

1. Rape *is the penetration, no matter how slight, of the vagina or anus, with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. This offense includes the rape of both males and females.*

Count one offense per victim. Include the crime as Rape, regardless of the age of the victim, if the victim did not consent or if the victim was incapable of giving consent. If the victim consented, the offender did not force or threaten the victim, and the victim was under the statutory age of consent, include the crime as Statutory Rape.

2. Fondling *is the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.*

Count one offense per victim. Fondling is recognized as an element of the other sex offenses. Therefore, count Fondling only if it is the only sex offense.

3. Incest *is sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.*

Count one offense per victim.

4. Statutory Rape *is sexual intercourse with a person who is under the statutory age of consent.*

Count one offense per victim.[3]

(In Virginia, Statutory rape is when a person is over 18 years of age, has any type of sexual activity with another that is under 18 years of age, also considered to be a minor, even though the sex could be

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[1] Include as Murder and Non-negligent Manslaughter: Any death caused by injuries received in a fight, argument, quarrel, assault or the commission of a crime.

Do not include as Murder and Non-negligent Manslaughter: Suicides; Fetal deaths; Traffic fatalities; Accidental deaths; Assaults with intent to Murder and attempts to Murder. (Classify assaults and attempts to Murder as Aggravated Assaults.); Situations in which a victim dies of a heart attack as the result of a crime, even in instances where an individual is known to have a weak heart; Justifiable homicide (which is defined as and limited to the killing of a felon by a peace officer in the line of duty, or the killing of a felon during the commission of a felony, by a private citizen).

[2] Include as Manslaughter by Negligence: Any death caused by the gross negligence of another. In other words, it's something that a reasonable and prudent person would not do.

Do not include as Manslaughter by Negligence: Deaths of persons due to their own negligence; Accidental deaths not resulting from gross negligence; Traffic fatalities. Remember that the findings of a court, coroner's inquest, etc., do not affect classifying or counting criminal incidents.

[3] Remember, if force was used or threatened, or the victim was incapable of giving consent because of his/her age or temporary or permanent mental impairment, the offense is Rape, not Statutory Rape (HCCR 3-6).

consensual. Moreover, force is not a requirement if someone is convicted of statutory rape, merely the sexual activity will be considered as statutory rape.[4]
*Examples of Sexual Assault (HCCR 3-8)

C. Robbery *is the taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.*
In any instance of Robbery**, count one offense for each distinct operation** (i.e., incident), including attempts. Do not count the number of victims robbed, the number of those present at the Robbery or the number of offenders.[5]
Essential Elements of a Robbery:

1) Committed in the presence of a victim (usually the owner or person having custody of the property);
2) Victim is directly confronted by the perpetrator;
3) Victim is threatened with force or put in fear that force will be used;
4) Involves a Theft or Larceny.

*Examples of Robbery (HCCR 3-10)

D. Aggravated Assault is *an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.* **Count one offense per victim**. However, if a number of persons are involved in a dispute or disturbance, and the aggressors cannot be distinguished from the victims, count the number of persons assaulted as the number of offenses.
Include as Aggravated Assaults:

1) Assaults or attempts to kill or Murder.
2) Poisoning (including the use of date rape drugs).
3) Assault with a dangerous or deadly weapon.
4) Maiming.
5) Mayhem.
6) Assault with explosives.
7) Assault with disease (as in cases when the offender is aware that he or she is infected with a deadly disease and deliberately attempts to inflict the disease by biting, spitting, etc.). It is not necessary that injury result from an aggravated assault when a gun, knife or other weapon is used which could or probably would result in a serious potential injury if the crime were successfully completed. The use of drugs to subdue a victim, such as the use of date rape drugs, **should be counted as Aggravated Assault** because it can be assumed that the intent was to inflict aggravated bodily harm.

*Examples of Aggravated Assault (HCCR 3-13)

D. Burglary *is t**he unlawful entry of a structure to commit a felony or a theft.* **Count one offence per each distinct operation.** For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or a felony; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

1) Forcible entry.

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[4] Also, it should be noted that the law in Virginia does not require the offender to be above the age of 18, if he/she is three years older or is below three years older than the victim, then it is also considered to be statutory rape. It is forbidden for a minor to be involved in any type of sexual activity with a person that is 18 years of age or older due to the fact that he/she does not have the judgment and/or maturity needed to make the right decisions concerning any sexual activity. A Virginia class one misdemeanor is issued upon an offender if he/she is older than 18 years of age and has any type of sexual activity with a minor between the ages of 15 and 17.

[5]

2) Un-lawful entry—no force.
4) Attempted forcible entry.[6]

*Examples of Lawful Access (HCCR 3-16)
*Example of Unlawful Access (HCCR 3-16)
*Examples of Burglary (HCCR 3-18-19)

F. Motor Vehicle Theft *is* *the theft or attempted theft of a motor vehicle.*
Classified as motor vehicle theft:

1) Theft of any self-propelled vehicle that runs on land surface and not on rails, such as sport utility vehicles, automobiles, trucks, buses, motorcycles, motor scooters, trail bikes, mopeds, all-terrain vehicles, self-propelled motor homes, snowmobiles, golf carts and motorized wheelchairs.
2) All incidents where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned. Include joyriding in this category. If a vehicle is stolen in conjunction with another offense, classify the crime using the procedures for classifying multiple offenses.[7]

*Example of Motor Vehicle Theft (HCCR 3-21)

G. Arson *is any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc*. **Count one offense for each distinct incident** of Arson occurring on your *Clery Act* geography.

Classify as Arson:

1) Only fires determined to have been willfully or maliciously set.
2) Attempts to burn.
3) Any fire that investigation determines to meet the UCR definition of Arson regardless of the value of any property damage.
4) Incidents where an individual willfully or maliciously burns his or her own property.[8]

*Examples of Arson (HCCR 3-23)

HATE CRIMES

Any of the offenses mentioned in the category of Criminal Offenses, and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/ Vandalism of Property that were motivated by bias; **Bias** is a preformed negative opinion or attitude toward a group of persons based on their race, gender, religion, disability, sexual orientation or ethnicity/national origin. However, WUV being a faith-

[6] Do not classify as Burglary: Thefts from automobiles, whether locked or not; Shoplifting from commercial establishments; Thefts from coin boxes or coin-operated machines; Thefts from areas of open access. If a perpetrator steals an item from an area of open access (i.e., there is no unlawful entry), the incident is a Larceny, not Burglary. (For example, if a student leaves his backpack under the table in a campus dining hall and another student takes it, it's a Larceny.); Robbery in which a structure can be burglarized, but it cannot be robbed. (It is possible, however, for an attempted Burglary to become a Robbery.); A forcible entry or unlawful entry in which no theft or felony occurs, but acts of vandalism, malicious mischief, etc., are committed, provided investigation clearly established that the unlawful entry was for a purpose other than to commit a felony or theft.

[7] **Do not classify as Motor Vehicle Theft:**
Theft of any of the following: Farm equipment, bulldozers, airplanes, construction equipment, water craft (motorboats, sailboats, houseboats or jet skis); Taking a vehicle for temporary use when prior authority has been granted or can be assumed, such as in family situations, rental car agreements, or unauthorized use by chauffeurs and others having lawful access to the vehicle; A forcible or unlawful entry of a building to steal a motor vehicle. Include this offense as a Burglary; Thefts from motor vehicles. Theft from a motor vehicle is Larceny, which is not a Clery Act crime unless it's motivated by bias (i.e., a Hate Crime). (More about this in the Hate Crimes section of this chapter on pages 3-25 through 3-35.)

[8] Do not classify as Arson: Fires of suspicious origin; Fires of unknown origin (HCCR 3-22)

based, Christian university, adherence by students, faculty, and staff personnel to biblical teachings on the subject of gender, gender identity, and gender orientation will not be viewed as hate crime.

Although there are many possible categories of bias, under Clery, only the following categories are reported (HCCR 3:25-35):

A. Race: *A preformed negative attitude toward a group of persons who possess common physical characteristics, e.g., color of skin, eyes, and/or hair; facial features, etc., genetically transmitted by descent and heredity which distinguish them as a distinct division of humankind, e.g., Asians, blacks or African Americans, whites.*

B. Gender: *A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender, e.g., male or female.*

C. Gender Identity: *A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity, e.g., bias against transgender or gender non-conforming individuals*. Gender non-conforming describes a person who does not conform to the gender-based expectations of society, e.g., a woman dressed in traditionally male clothing or a man wearing makeup. A gender non-conforming person may or may not be a lesbian, gay, bisexual, or transgender person but may be perceived as such.

D. Religion*: A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being, e.g., Catholics, Jews, Protestants, atheists.*

E. Sexual orientation: *A preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation. Sexual Orientation is the term for a person's physical, romantic, and/or emotional attraction to members of the same and/or opposite sex, including lesbian, gay, bisexual, and heterosexual (straight) individuals.*

F. Ethnicity: *A preformed negative opinion or attitude toward a group of people whose members identify with each other, through a common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry.* The concept of ethnicity differs from the closely related term "race" in that "race" refers to a grouping based mostly upon biological criteria, while "ethnicity" also encompasses additional cultural factors.

G. National Origin: *A preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth.* This bias may be against people that have a name or accent associated with a national origin group, participate in certain customs associated with a national origin group, or because they are married to or associate with people of a certain national origin.

H. Disability: *A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.*
For Clery Act purposes, Hate Crimes include any of the following offenses that are motivated by bias: Murder and Non-negligent Manslaughter; Sexual Assault; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; Arson (the seven categories described in the Criminal Offenses); Larceny-Theft; Simple Assault; Intimidation; Destruction/Damage/Vandalism of Property. And thus,

F. Larceny-Theft: *The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another*.* (Larceny and theft mean the same thing in the UCR.)

*__Constructive possession__ is the condition in which a person does not have physical custody or possession but is in a position to exercise dominion or control over a thing.

Classify as Larceny:

1) Thefts of bicycles or automobile accessories.
2) Shoplifting.
3) Pocket-picking.
4) The stealing of any property or article that is not taken by force and violence or by fraud.
5) Any of the above regardless of the value of the item or items taken (For example, include the unlawful taking of a parking sticker that is peeled off a car windshield.)
6) Attempted larcenies.[9]

G. Simple Assault *is an unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.*
Include all assaults that do not involve the use of a firearm, knife, cutting instrument or other dangerous weapon, and in which the victim did not sustain serious or aggravated injuries.

H. Intimidation *is to unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.*
A person is assumed to be placed in "reasonable fear" if he or she reports threatening words or other conduct to law enforcement personnel. To be the victim of Intimidation, one doesn't have to be the intended target of the offender. For example, a person who reports seeing anti-gay threats on a bathroom wall to law enforcement is considered a victim. (For the Intimidation to be considered a Hate Crime there would have to be other supporting evidence of bias as well.) Include in this category cyber-intimidation if the victim is threatened via electronic means while on your *Clery Act* geography.

I. Destruction/Damage/Vandalism of *Property* *is to willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.*
Classify as Destruction/Damage/Vandalism of Property a wide range of malicious behavior directed at property, such as:

1) Cutting auto tires.
2) Drawing obscene pictures on restroom walls.
3) Smashing windows.
4) Destroying school records.
5) Defacing library books.[10]

Classifying a crime as a Hate Crime is sometimes difficult. For further information about Hate Crime the following information adapted from the FBI's Hate Crime Data Collection Guidelines and Training Manual should be useful in guiding us. Before an incident can be classified as a Hate Crime, sufficient objective facts must be present to lead a reasonable and prudent person to conclude that the offender's actions were motivated, in whole or in part, by bias. (See HCCR 3-2932)
*Examples of Hate Crime (HCCR 3-33-35)

CRIMINAL OFFENSES FOR THE VIOLENCE AGAINST WOMEN'S ACT (VAWA)

[9] Do not classify as Larceny: Motor Vehicle Theft; Attempted Motor Vehicle Theft; Embezzlement; Confidence games; Forgery; Worthless checks.
[10] **Do not classify as Destruction/Damage/Vandalism of Property:** Incidents of burning that willfully or maliciously destroy, damage or deface property. Classify such incidents as Arson.

Any incidents of Domestic Violence, Dating Violence and Stalking. (Note that Sexual Assault is also a VAWA Offense but is included in the Criminal Offenses category for *Clery Act* reporting purposes).[11]

A. Domestic Violence *is defined as a felony or misdemeanor crime of violence committed*:

1) By a current or former spouse or intimate partner of the victim;
2) By a person with whom the victim shares a child in common;
3) By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
4) By a person similarly situated to a spouse of the victim under the domestic violence laws of the jurisdiction in which the crime of violence occurred, or;
5) By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

To categorize an incident as Domestic Violence, the relationship between the perpetrator and the victim must be more than just two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship.
*Example of Domestic Violence (HRCC 38)

B. Dating Violence *is defined as violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.* For the purposes of this definition:

1) Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
2) Dating violence does not include acts covered under the definition of domestic violence.

We caution that differences in the culture of different people and their use of terms may mean that a reporting party may describe a dating relationship using different terms from how an institutional official might describe "dating." When the reporting party asserts that there was a dating relationship, you should assume that the victim and perpetrator were in a dating relationship to avoid incorrectly omitting incidents. The victim's use of terms such as "hanging out" or "hooking up" rather than "dating," or whether or not the relationship is described as "monogamous" or "serious" should not be the determining factor. No matter who reports the incident, whether it is the victim or a third party, it is the responsibility of the institution to determine whether the incident should be included as Dating Violence. (HRCC 3-36)
*Example of Dating Violence (HRCC 3-37)

C. Stalking *is defined as engaging in a course of conduct* directed at a specific person that would cause a reasonable person** to:*

1) *Fear for the person's safety or the safety of others; or*
2) *Suffer substantial emotional distress.****

Course of conduct *means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.*

****Reasonable person** *means a reasonable person under similar circumstances and with similar identities to the victim.*

*****Substantial emotional distress** *means significant mental suffering or anguish that may but does not necessarily require medical or other professional treatment or counseling.*

[11] HRCC 3-36

A single course of conduct may include varying Stalking activities and may include acts committed over electronic communication (e.g., emails, texts or social media). Cyberstalking, also known as tech-facilitated stalking, is a form of stalking which can include, but is not limited to, phone, text, or social media platforms. Stalking may involve individuals who are known to one another or have an intimate or sexual relationship or may involve individuals who are not known to one another.
*Examples of stalking (HRCC 3-40)

Rules for Counting VAWA Offenses
The Hierarchy Rule does not apply to VAWA Offenses. Therefore, for any Criminal Offense, Hate Crime, or arrest for Weapons, Drug or Liquor Law Violations that is also a VAWA Offense, your statistics must reflect the original offense and the VAWA Offense. For example, if an Aggravated Assault is also Domestic Violence, include the incident as one Aggravated Assault in the Criminal Offenses category and as an incident of Domestic Violence in the VAWA Offenses category. (HRCC 3-41)

ARRESTS AND DISCIPLINARY REFERRALS FOR VIOLATION OF WEAPONS, DRUGS, AND LIQUOR LAWS
The higher education institution must disclose is the number of arrests and the number of persons referred for disciplinary action for the following law violations:

1) Weapons: Carrying, Possessing, Etc.; 2) Drug Abuse Violations; and 3) Liquor Law Violations.

A. Referred for disciplinary action *is defined as the referral of any person to any official who initiates a disciplinary action of which a record is established, and which may result in the imposition of a sanction.*

If the process involves the following three criteria, it's a disciplinary action under the *Clery Act*:

1) The official receiving the referral must initiate a disciplinary action;
2) A record of the action must be established; and
3) The action may, but does not have to, result in a sanction.

Documentation of the referral must be maintained for purposes of *Clery Act* compliance for three years from the latest publication of the annual security report to which they apply. (HRCC 3-45)

B. Weapons: Carrying, Possessing, Etc., is defined as the violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature.

Classify as a Weapons: Carrying, Possessing, Etc., Violation:

1) Manufacture, sale, or possession of deadly weapons.
2) Carrying deadly weapons, concealed or openly.
3) Using, manufacturing, etc., of silencers.
4) Furnishing deadly weapons to minors.
5) Aliens possessing deadly weapons.
6) Attempts to commit any of the above.

This type of violation is not limited to "deadly" weapons; it also applies to weapons used in a deadly manner.

C. Drug Abuse Violations *are defined as the violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.*

Classify as a Drug Abuse Violation:

1) All drugs, without exception, that are illegal under local or state law where your institution is located. This means that if you have campuses in different states, the laws may differ for each of them.
2) All illegally obtained prescription drugs.[12]

D. Liquor Law Violations *are defined as the violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.*

Classify as a Liquor Law Violation:

1) The manufacture, sale, transporting, furnishing, possessing, etc., of intoxicating liquor;
2) Maintaining unlawful drinking places;
3) Bootlegging;
4) Operating a still;
5) Furnishing liquor to a minor or intemperate person;
6) Underage possession;
7) Using a vehicle for illegal transportation of liquor;
8) Drinking on a train or public conveyance; and
9) Attempts to commit any of the above.[13]

*Example of Arrests and Referrals (HRCC 3-49; 3-50)

Note: *Statistics must be disclosed separately for each of these four general categories. This means that when an incident meets definitions in more than one of these categories, it must be reported in each category. For example, any Criminal Offense that is also a Hate Crime or VAWA Offense, or results in an arrest or disciplinary action for a Weapons, Drug Abuse or Liquor Law Violation, should be counted as a Criminal Offense and also as a Hate Crime, VAWA Offense, arrest, or disciplinary referral, as appropriate. The Hierarchy Rule discussed on pages 3-24 and 3-25 applies only when counting crimes within the Criminal Offenses category.*

SECTION IV: ACQUIRING AND REPORTING CRIME STATISTICS

WUV, does not have a security department and, therefore, is not required to maintain a crime log (HRCC 5-1-5-2). Local law enforcement personnel* patrol near campus and our Clery crime statistics** are obtained from their department for the Annual Safety Report (ASR).

*Local law enforcement refers to outside law enforcement agencies or departments with jurisdiction over some or all of our Clery geography.

**Clery crime statistics from local law enforcement agencies that have jurisdiction over the school's Clery geography

A. Counting Crime Statistics

See each Clery crime section for counting crimes statistics. (HRCC 3-1-3-55; 4-1-4-12)

B. Reporting Statistics

Annual Clery Crime Statistics

Type of Incident	On Campus	Non-Campus	Public Properties	Total

[12] Do not classify as a Drug Abuse Violation: Possession of a small amount of marijuana in states that have decriminalized this conduct, meaning that the conduct is no longer a criminal offense. Referrals that occur for this decriminalized conduct should not be counted for Clery Act reporting purposes; Use of legally obtained, personal prescription drugs used by the owner in a manner not consistent with the instructions provided by the physician.

[13] Do not classify as a Liquor Law Violation: Drunkenness (unless state law classifies drunkenness as internal possession and a violation of possession laws); Driving under the influence.

	2020	2021	2022	2023	2024
Murder / Non-Negligent Manslaughter					
Negligent Manslaughter					
Sex Offenses - Forcible					
Sex Offenses – Non-Forcible					
Robbery					
Aggravated Assault					
Burglary					
Motor Vehicle Theft					
Arson					
Weapons, carrying, Possessing					
Drug Abuse Violations					
Liquor Law Violations					
Hate Crime-Race					
Hate Crime- Theft					
Hate Crime Intimidation					
Hate Crime Vandalism/Property					
Domestic Violence					
Dating Violence					
Stalking					
Liquor Law Violations					
Drug Law Violations referred for Disciplinary Action					
Illegal Weapons Possession Arrests					

SECTION V: DAILY CRIME LOG

According to the Handbook for Campus Safety and Security Reporting provided by the U.S. Department of Education, your institution is not considered to have a security department and, therefore, is not required to maintain a crime log if you only have:

1) Local law enforcement personnel who patrol on or near your campus, but who do not have a written agreement or contract with your institution for these services.

2) An individual or individuals with limited responsibility for campus security (e.g., someone monitoring access to a campus building by checking student IDs) but who does not perform other security services; or
3) Security personnel employed or contracted by a landlord from whom your institution rents classroom space.

For this reason, WUV is not required to maintain a daily crime log but is required to obtain crime statistics for our Clery Geography from the local police departments. (HRCC 5-1-5-2)

Daily Crime Log (for the future use)
Calendar Year 2024

Nature (classification)	Case	Date/Time Reported	Date/Time Occurred	General Location	Disposition

SECTION VI: EMERGENCY RESPONSE AND TIMELY WARNINGS

The HEA has specific requirements intended to help you keep your students and employees informed about threats to their safety and health in a manner that allows them to protect themselves. (HRCC 6-1)

A. When is an emergency response necessary?

Under Clery, WUV is required to immediately notify the campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring **on the campus (4300 and 4302 buildings)**. An **"immediate" threat** as used here encompasses an imminent or impending threat, such as an approaching forest fire, as well as a fire currently raging in one of your buildings.[14]

Some other examples of significant emergencies or dangerous situations are:

1) Outbreak of meningitis, norovirus or other serious illness; 2)
2) Approaching tornado, hurricane or other extreme weather conditions;
3) Earthquake;
4) Gas leak;
5) Terrorist incident;
6) Armed intruder;
7) Bomb threat;
8) Civil unrest or rioting;
9) Explosion; and
10) Nearby chemical or hazardous waste spill.[15]

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[14] The *Clery Act* requires every Title IV institution, without exception, to have and disclose emergency response and evacuation procedures that would be used in response to a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.

[15] Examples of situations that would not necessitate an emergency notification under the *Clery Act*: Power outage; Snow closure; String of larcenies. These are situations in which your institution might choose to alert the campus community; however, they do not meet the threshold of a significant emergency or dangerous situation for the purposes of this regulation. (If your institution has a policy that requires issuing an emergency alert for these or similar events, however, you must follow that policy.)

Due to the small size of WUV, the campus will be verbally notified upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.
Additionally, the campus encourages students to enroll in it's "student text list" for up to date emergency information. This program requires a student to text the word "STUDENT" to 36000, allowing their cell phone number to be added to the campus' data base. Should a situation arise as previously stated, a text message would be sent to all enrolled students providing additional notification.

B. WUV Emergency Procedure

1. How to Report Crimes

The Campus Safety Department under the supervision of the Office of Dean of Student Life encourages prompt reporting of all criminal matters. If you are a victim of a crime and do not want to pursue action within the college or criminal justice system, you may still want to consider making a confidential report. With your permission the Campus Safety Director or a designee can file a report on the details of the incident without revealing your identity. The purpose of the confidential report is to comply with your wishes to keep the matter confidential, while taking steps to ensure the future safety of yourself and others.
With such information, the college can keep an accurate record of the number of incidents involving students, determine where there is a pattern of crime with regard to a particular location, method or assailant and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the college. These anonymous reports can be filed either in the Campus Safety Office or by completing the online form at: info@wuv.edu.
Emergencies and crimes in progress can be reported using the following methods:

1) Dial 9-1-1 to contact Emergency Services directly;
2) If possible, notify campus emergency at 571-730-8380 to report a past crime or incident;
3) Call the campus safety mobile phone 571-730-8369 or Annandale Police at 703-256-8035;
4) To report non-emergencies, call 703-333-5904 from any phone;
5) Go to any office on campus and ask them to contact the Campus Safety Department.
6) Access info@wuv.edu and fill out the incident report form.

2. Emergency Response and Evacuation Procedures Policy

WUV will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency. (Mandatory; HRCC 6-7)

3. Personnel Responsible for the Procedures:

1) For both 4300 building: Dean of Students/Director of Campus Safety and Security; Vice President of Administration; Facilities Manager. Director of Campus Safety and Security issues an emergency notification, while facilities manager is responsible for containing the emergency. VPA communicates with other departments to provide personnel and other information if needed.
2) For 4302 building: Bristow Management Company located at 4306 building.
The Director of Campus Safety and Security will work with the BMC, informing it of the emergency for verification and confirmation, and issuing the notification, etc.

4. Emergency Response and Evacuation Procedures

Upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus WUV will use the following procedures:

1) WUV officials, VP of Administration, Dean of Students/Director of Campus Safety and Security and Facilities Manager will verify and confirm* that a legitimate emergency or dangerous situation exists.

* Confirmation doesn't necessarily mean that all of the pertinent details are known or even available. (HRCC 6-3)

2) VP of Administration, Dean of Students, and Facilities Manager will determine the appropriate segment or segments of the campus community to receive a notification.[16] There will be a continuing assessment of the situation and that additional segments of the campus community may be notified if a situation warrants such action.
3) VP of Administration, Dean of Students, and Facilities Manager will determine the content of the notification, how much information is appropriate to disseminate at different points in time.[17]
4) Director of Campus Safety and Security will initiate the notification system, notifying the campus community that there's an emergency or dangerous situation by using fire alarms and public address system to alert the campus community, sending follow up text messages, posted bulletins, and emails as more specific information becomes available.

5. Dissemination of the Emergency Information to the Larger Community

To disseminate the emergency, WUV will use radio and/or TV alerts for the neighboring community. The Director of Campus Safety and Security and VPA are responsible for developing the information to be disclosed, and The Director of Campus Safety is responsible for disseminating the information to the larger community. (HRCC 6-9)

The institution will immediately notify the campus community upon confirmation of an emergency or dangerous situation unless issuing will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency. Additionally, alerts are sent when hazardous conditions exist. Alerts are sent via voice, text, and email messages to the subscriber in case of emergency. Students can sign up for WUV Campus ALERTS at the Admissions Office.

All communication systems are subject to failure, as such, we should strive to maintain SITUATIONAL AWARENESS, the ability to identify, process, and comprehend information about how to survive in an emergency situation. More simply, it's knowing what is going on around you.

6. Test the Emergency Response and Evacuation Procedures (annual)

The *Clery Act* regulations define a test as regularly scheduled drills, exercises and appropriate follow-through activities, designed for assessment and evaluation of emergency plans and capabilities. To comply with the *Clery Act* requirement the test must meet all of the criteria in the definition. It must:

1) Be scheduled. An actual emergency situation or a false emergency alarm cannot be served as a test of the emergency response and evacuation procedures.
2) Contain drills. A drill is an activity that tests a single procedural operation (e.g., a test of initiating a cell phone alert system or a test of campus security personnel conducting a campus lockdown).
3) Contain exercises. An exercise is a test involving coordination of efforts (e.g., a test of the coordination of first responders, including police, firefighters, and emergency medical technicians).
4) Contain follow-through activities. A follow-through activity is an activity designed to review the test (e.g., a survey or interview to obtain feedback from participants).

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[16] We may state that the entire campus community will be notified when there is at least the potential that a very large segment of the community will be affected by a situation, or when a situation threatens the operation of the campus as a whole.

[17] For example, depending on what segments of the community our notification targets, the content may differ. In the case of an approaching tornado, we may want to tell on campus students to evacuate, but we may want to tell commuter students to stay away from the campus.

5) Be designed for assessment of emergency plans and capabilities. This means that your test should have measurable goals. For example, "Everyone involved in the emergency response and notification procedures will understand his or her role and responsibility."
6) Be designed for evaluation of emergency plans and capabilities. Design the test so that, using the assessments, you can judge whether or not the test met its goals. For example, "The evacuation process accounted for/did not account for the diverse needs of all members of the campus community."[18]
7) Publicize the emergency response and evacuation procedures in conjunction with at least one test per calendar year. WUV will send a "blast" email or text messages containing a link to its procedures. (HRCC 6-10)
8) WUV will document, for each test, a description of the exercise, the date, time and whether it was announced or unannounced. (HRCC 6-11)
4) A description of the exercise (i.e., the test).
5) The date the test was held.
6) The time the test started and ended.
7) Whether the test was announced or unannounced.

As with all other Clery Act-related documentation, WUV will keep emergency test documentation for seven years.

SECTION VII. TIMELY WARNINGS

The Clery act requires WUV to alert the campus community to certain crimes in a manner that is **timely and will aid in the prevention of similar crimes**. Although Clery doesn't define "timely," because the **intent of a warning regarding a criminal incident(s) is to enable people to protect themselves** this means that **a warning will be issued as soon as the pertinent information is available**. Even if all the facts surrounding a criminal incident are not known, a warning that contain information about the type of incident that has occurred will still be issued to ensure safety of staff and students. Updates will be made when additional information becomes available.

A. Timely Warning Policy

In the event that a situation arises, either on or off campus, that, in the judgment of the chief of local police, constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The warning will be posted throughout the school and announced by staff and owners.

Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the WUV community and individuals, the administrative office or owner's may also post a notice on the WUV website, providing the community with more immediate notification, such as "blast" email. Anyone with information warranting a timely warning should report the circumstances to the local police, or the University administrative office.

B. Crimes Subject to a Timely Warning

You must issue a timely warning for all *Clery Act* crimes that occur on your *Clery Act* geography that are:
1) Reported to campus security authorities or local police agencies; and

[18] You have flexibility in designing tests. For example, you may conduct a tabletop exercise (i.e., a simulated scenario) or conduct a live test. Whichever method you use, your test must address emergency response and evacuation on a campuswide scale. "Campuswide" scale means that tests must address your plan for evacuating all of your campus buildings. This does not mean that your plan must involve evacuating the entire campus at once. Rather, it means you must have a plan for each building. We recognize that a shelter-in-place contingency might be the best procedure to use in certain circumstances when evacuation is not a reasonable option. (HRCC 6-10)

2) Considered by the institution to represent a serious or continuing threat *to* students and employees. The requirement for timely warnings is not limited to violent crimes or crimes against persons so you should not have a timely warning policy that contains this restriction. Timely warnings could be needed for crimes that represent threats to property. WUV's timely warning policy is not limited to certain types of *Clery Act* crimes and it may include non-*Clery Act* crimes.[19]

C. Making the Decision to Issue a Timely Warning

1) The nature of the crime;
2) The continuing danger to the campus community;[20]
3) The possible risk of compromising law enforcement efforts.[21]

D. Determining the Content of a timely Warning

The *Clery Act* regulations do not specify what information has to be included in a timely warning. However, because the intent of the warning is to enable members of the campus community to protect themselves, the warning should include all information that would promote safety and that would aid in the prevention of similar crimes. Issuing a warning that cautions the campus community to be careful or to avoid certain practices or places is not sufficient.

E. Issuing a Timely Warning

Although there is no required format for a timely warning, WUV understands that the warning must be reasonably likely to reach the entire campus community. Therefore, timely warnings must be issued in a manner that gets the word out quickly and effectively communitywide. A combination of dissemination methods may be used, including e-mails, bulletins posted around campus, and text messages.

The Family Educational Rights and Privacy Act (FERPA) and the Timely Warning Requirement

The *Clery Act* does not require confidential reporting of crimes. Although personally identifiable information is generally precluded from disclosure, such information may be released in an emergency situation.

FERPA does not preclude an institution's compliance with the timely warning provision of the campus security regulations. FERPA recognizes that information can, in case of an emergency, be released without consent when needed to protect the health and safety of others. In addition, if institutions utilize information from the records of a campus law enforcement unit to issue a timely warning, FERPA is not implicated as those records are not protected by FERPA.

SECTION IIIV. WUV EXCEPTIONS

WUV does not participate in Title IV; WUV as a Christian University, is exempt from Title IX (34 CFR Ch. 1 [7-1-97 Edition; §106.12]). WUV does not have on-campus student housing facilities. WUV does not have its own campus police.

A. Title IX Participation

1) Title IV: Security Act of 1990 (Title II of Public Law 101-542), which amended the Higher Education Act of 1965 (HEA). This act required **all postsecondary institutions participating in HEA's Title IV student financial assistance programs** to disclose campus crime statistics and security information. The act was amended in 1992, 1998, 2000 and 2008. The 1998 amendments

[19] Your institution is not required to provide a timely warning for non-*Clery Act* crimes or for crimes reported to a pastoral or professional counselor. (See Chapter 4 for definitions of pastoral and professional counselors.) There are no other exemptions. (HRCC 6-13)
[20] Example (HRCC 6-13)
[21] Example (HRCC 6-14)

renamed the law the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act in memory of a student who was slain in her dorm room in 1986. It is generally referred to as the *Clery Act* and is in section 485(f) of the HEA.[22] (HRCC 1-2)

2) If your institution does not participate in the Title IV programs or has a "deferment only" status (i.e., it does not provide student loans or grants through Title IV programs but does have students who are eligible to defer federal student loans while they are enrolled in your school), you are not required to comply with the requirements described in this handbook. (HRCC 1-3)

B. Title IX Participation: 34 CFR Ch. 1 (7-1-97 Edition)

§ 106.12 Educational institutions controlled by religious organizations.

(a) Application.

This part does not apply to an educational institution which is controlled by a religious organization to the extent application of this part would not be consistent with the religious tenets of such organization.

(b) Exemption.

An educational institution which wishes to claim the exemption set forth in paragraph (a) of this section, shall do so by submitting in writing to the Assistant Secretary a statement by the highest ranking official of the institution, identifying the provisions of this part which conflict with a specific tenet of the religious organization. (Authority: Secs. 901, 902, Education Amendments of 1972, 86 Stat. 373, 374; 20 U.S.C. 1681, 1682)

C. On-campus Housing Facilities

WUV does not have student housing facilities.

D. Exceptions

Based on Section IX, A, B, C, WUV is not required to maintain:

1) Missing student notification procedures[23] (HRCC 1-8.3; 7-9);

2) Crime log (HRCC 5-1-5-2)[24];

3) Drug alcohol abuse education programs (Title IV; Section 120 (a) through (d) of the *HEA*);[25]

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[22] All public and private postsecondary institutions that participate in any of the Title IV programs must comply with the HEA. Title IV institutions have signed Program Participation Agreements (PPAs) with the U.S. Department of Education (the Department) to administer these financial assistance programs. The programs include Pell Grants, Federal Supplemental Educational Opportunity Grants (FSEOGs), the Federal Work-Study Program, Federal Perkins Loans, the Federal Direct Loan Program, and the Leveraging Educational Assistance Partnership (LEAP). If you are not sure whether your institution participates in the Title IV programs, contact your institution's financial aid officer or chief executive officer.

[23] …if your institution has any on-campus student housing facilities… (HRCC 1-8.3).

[24] On the other hand, your institution is not considered to have a security department and, therefore, is not required to maintain a crime log **if you only have local law enforcement personnel who patrol on or near your campus, but the local law enforcement agency does not have a written agreement or contract with your institution for these services; an individual or individuals with limited responsibility for campus security (e.g., someone monitoring access to a campus building by checking student IDs) but who does not perform other security services;** or security personnel employed or contracted by a landlord from whom your institution rents classroom space. The determination of whether or not your institution's security personnel constitute a campus police or security. department must be consistent with the campus security policy statement you disclose in your annual security report (more about this in Chapter 7). (HRCC 5-1, 2)

[25] HEA Title I, Section 120 relating to Drug and Alcohol Abuse Prevention Requires that the institution determine the number of drug and alcohol-related incidents and fatalities occurring on campus, or as part of an institution's activities, that are reported to campus officials; and the number and type of sanctions imposed as a result of such incidents and fatalities. Additionally, requires that each student, upon enrollment, receive a separate, clear and conspicuous written notice with information on the penalties associated with drug related offenses under existing section 484(r) of the HEA; and provide timely notice to each student who has lost eligibility for a grant, loan, or

4) Fire safety log;[26] (HRCC 3-47, 48)
5) Fire safety statistics;[27] or
6) Annual fire safety report.[28]

SECITON IX: REFERENCES

• U.S. Department of Education, Office of Postsecondary Education, The Handbook for Campus Safety and Security
• https://www.notalone.gov/assets/ferpa-Clerychart.pdf

work study assistance as a result of penalties under 484(r) of the HEA on the way to regain eligibility under section 484(r)(2) of the HEA.

[26] if your institution has any **on-campus student housing facilities**… (HRCC 1-8.3).

[27] …publish an annual fire safety report containing policy statements as well as fire statistics associated with each **on-campus student housing facility** (HRCC 1-8.3). **An institution that maintains any on-campus student housing facilities** must publish an annual fire safety report by Oct. 1. This is a firm deadline; there is no grace period and there are no exemptions. The purpose of this report is to disclose fire safety policies and procedures related to your on-campus student housing and to disclose statistics for fires that occurred in those facilities. (HRCC 14-1)

[28] Ibid.