



# Mobilizing Your Coordinated Community Response (CCR) Team to Support Clery Act Implementation



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# Acknowledgements

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OVW was created in response to the passage of the Violence Against Women Act (VAWA) in 1994 to provide federal leadership in developing the national capacity to reduce violence against women and administer justice for, and strengthen services to, survivors of domestic violence, dating violence, sexual assault, and stalking (DVSAS). Since 1998 the OVW Campus Program has supported colleges and universities by building their capacity for implementing comprehensive, coordinated responses to DVSAS.

This resource is designed to demonstrate how the Clery Act can be an important tool for a comprehensive approach to the prevention and response of DVSAS on campus, and provide strategies for engaging coordinated community response team members in the implementation of Clery Act requirements.

We are grateful to the following collaborators who reviewed and provided feedback on this resource: NOVA's Coordinated Community Response Advisory Council; Alteristic, East Central University, Mississippi Coalition Against Sexual Assault, Victim Rights Law Center, and NOVA Culturally Specific Team.

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# What is the Clery Act?



The Clery Act is a federal campus safety law that aims to provide transparency around post-secondary campus crime policy and statistics.

It requires colleges and universities to:

- Record campus crimes and fires in daily logs
- Publicize crime statistics and campus safety policies in an annual security report by October 1 of each year
- Issue timely warnings when there are known risks to public safety on campus
- Provide specific rights and options to victims of sexual assault, domestic violence, dating violence and stalking (DVSAS) and publicly outline the policies and procedures in place to prevent and respond to these crimes.

## Who is required to report crimes under the Clery Act?

Individuals called campus security authorities (CSAs) must report crime statistics. They include:

- Campus police and campus security officers
- Anyone responsible for campus security
- Anyone designated in campus policies as someone to whom students and employees should report crimes
- Anyone with significant responsibility for student and campus activities

## How does the Clery Act intersect with Title IX?

Title IX is a federal civil rights law that prohibits discrimination on the basis of sex in federal funded programs and activities. Both laws address how an institution responds to sexual assault, domestic violence, dating violence, and and stalking and both are enforced by the Department of Education; however, they are enforced by separate divisions. For more information on Title IX, visit the [Office for Civil Rights website](#).

Where can I find more information about crimes that must be reported or what locations are Clery-reportable?

Visit the [Department of Education's Campus Security resources](#) or Clery Center's [Resource Library](#) for more information.

Policies required under the Clery Act cover an array of campus safety topics, such as emergency notification, alcohol and other drugs, and security and access to campus facilities, to name a few.

These policies, particularly those addressing DVSAAS, are developed and implemented by various departments on campus, including residence life, student conduct, victim services, and public safety.

In order to effectively prevent and respond to these crimes, colleges and universities should have a multidisciplinary response and in order to meet the Clery Act's requirements, institutions must have a multidisciplinary response.

The structure and strategies used by Coordinated Community Response (CCR) Teams can support Clery Act implementation and compliance efforts by fostering successful collaboration, and can help institutions sustain their DVSAAS prevention and response efforts. Mobilizing Your Coordinated Community Response Team to Support Clery Act Implementation is designed for you to analyze your existing approach to Clery Act implementation to determine how the CCR Team can support or enhance these efforts.

For more information on Clery Act requirements, please see the [Clery Act regulations](#) or visit [www.clerycenter.org](http://www.clerycenter.org).



# What is a Coordinated Community Response (CCR) Team?

A CCR Team is a multidisciplinary team of campus and community partners who meet regularly to assess, plan, monitor, and evaluate campus prevention and response efforts within the context of their institution.

A CCR Team is distinct from a traditional campus committee. While both a CCR Team and traditional campus committees are multidisciplinary in nature, there are distinct differences in each of these models to consider when thinking through the best structure to fit your institution, including the scope, the composition, and activities.

CCR Team Model	Committee Model
<b>Scope:</b> High-level institutional prevention and response to DVSAAS.	<b>Scope:</b> Narrow and focused on one particular area (e.g. Clery compliance).
<b>Composition:</b> Broad and includes campus personnel, impacted communities including students and survivors, and community partners.	<b>Composition:</b> Limited to campus personnel and based on role within the institution.
<b>Approach:</b> Strategically uses cross-training to cultivate a learning community, identifies ways to enhance collaboration, and builds skills amongst the team.	<b>Approach:</b> Focused on making targeted recommendations, decisions, and/or monitoring progress for a particular area.
<b>Length:</b> Ongoing	<b>Length:</b> Ongoing or time-limited.

There are multiple factors that influence how the CCR Team can facilitate Clery Act implementation and compliance, including:

- The size and context of the institution;
- Whether or not the institution has designated roles or a department for Clery Act compliance;
- The structure of the existing CCR Team;
- Existing Clery Act compliance successes and challenges; and
- Institutional needs related to surfacing reporting, options, and education for survivors, especially students with historically marginalized identities.

There are many different types of CCR Team structures that campuses use. It is important to think through the structures because the structure determines how information is shared, how feedback is elicited and shared, and ultimately how decisions are made.

For more information on structuring CCR Teams, see [Building Coordinated Community Response Teams to Address Domestic Violence, Dating Violence, Sexual Assault, and Stalking on Campus: A Toolkit for Institutions of Higher Education](#).

**CCR Team structures should be based on the campus context and identified needs and priorities, not the other way around.**

The goal in determining CCR Team structure is to:

1. Create a structure that makes sense and is sustainable for your campus context;
2. Create a mechanism for input from a wide variety of stakeholders, including culturally specific and historically marginalized communities; impacted communities such as students and survivors; and to counter siloed decision-making; and
3. Facilitate transparency by sharing not only what policies and protocols are in place, but the processes for decision-making that led to these policies and protocols.

“It was very helpful in my work as Project Director to be one of the people reviewing the Annual Security and Fire Safety Report to ensure all of the work happening through the Campus Program Grant was included in the report, this also gave me insight into other efforts happening across campus around safety, which lead to additional collaborations with other areas of the college.”

- OVW Campus Program Grantee

## Where do we start?

In order to leverage the CCR Team to address Clery implementation and compliance, here are a few starting points to consider.

- Point A** ➤ Has no Clery Act coordinator and no cross-departmental team or committee working on Clery Act compliance
- Point B** ➤ Has no Clery Act coordinator, but does have a cross-departmental team or committee working on Clery Act compliance
- Point C** ➤ Has a designated Clery Act coordinator, but no Clery Act team or committee
- Point D** ➤ Has a designated Clery Act coordinator and a functional Clery Act team or committee

In each section, you will see a list of possible action steps, roles, and responsibilities depending on the Starting Point. Please note that because each campus is different, we've organized the roles by topic area (law enforcement, conduct, prevention, victim services), however, consider how other roles performing these functions or influenced by the outcomes may be involved.

You'll also see certain actions happening by multiple roles - this is intentional to get as much knowledge and feedback as possible, but may not always be possible on each campus. You may find you can only have one person or role on a subcommittee performing a certain task.

## **Starting Point A: Has no Clery Act coordinator and no cross-departmental team or committee working on Clery Act compliance.**

An institution at starting point A may benefit from forming a CCR Team subcommittee or working group on Clery Act implementation and compliance. The function of this subcommittee or working group would be to centralize all strategic plan activities related to Clery Act implementation and compliance such as:

- Developing a prevention policy;
- Updating or creating other policies as needed;
- Training conduct professionals;
- Training campus security authorities; and
- Creating, editing, and/or updating written materials for victims (written explanation of rights and options).

They could also coordinate the timing and implementation of these goals. Because the institution does not have a central role focused on Clery Act compliance and no team to support these efforts, a subcommittee or working group will help the institution start to build an infrastructure for long-term, ongoing compliance with the Clery Act while initially focusing on specific, measurable goals.

The creation of a working group or subcommittee does not mean that the group must be responsible for implementing all of the goals. For example, an institution may have subcommittees that intersect with Clery compliance goals, such as a subcommittee focused on training conduct professionals. If that's the case, the subcommittee would ensure that they are monitoring progress on that goal and that there's Clery Act expertise represented in the development of such training.

# Has no Clery Act coordinator and no cross-departmental team or committee working on Clery Act compliance.

## PREVENTION

Action Step: Before creating or selecting a program, review to ensure the program meets Clery Act requirements.

Role	Subcommittee Participation
<b>Prevention</b>	Read and understand Clery Act requirements for prevention programs. Recommend prevention programs for subcommittee review. Develop or identify tools for content review for Clery Act compliance for all committee members involved in performing the review to use. Review content to ensure programs meet Clery Act requirements.
<b>Conduct</b>	Review potential program content to ensure programs meet Clery Act requirements. Ensure prevention program recommendations are aligned with institutional policy guiding prevention, or used to guide the development of the prevention policy if one does not yet exist.
<b>Law Enforcement</b>	Share resources or training information about Clery Act requirements. Document any existing or considered prevention programs on domestic violence, dating violence, sexual assault, and stalking to be included in the review. Participate in content review to ensure programs meet the requirements.
<b>Victim Services</b>	Review content to ensure programs meet Clery Act requirements.

## Action Step: Create or update Clery-required prevention policy

Role	Subcommittee Participation
<b>Prevention</b>	<p>Participate in training or learning about Clery Act prevention policy requirements.</p> <p>Provide information on current prevention efforts.</p> <p>Collaborate on draft policy language.</p>
<b>Conduct</b>	<p>Determine whether prevention policy exists or needs to be created or updated.</p> <p>Determine who the campus owner of the policy should be and all necessary steps for creation on approval.</p> <p>Collaborate to draft policy language and lead the process for review and approval.</p> <p>Determine where policy will be posted and how it will be communicated to the campus community.</p>
<b>Law Enforcement</b>	<p>Collaborate on draft policy language to ensure it reflects existing programs.</p>
<b>Victim Services</b>	<p>Collaborate on draft policy language to ensure it reflects existing programs.</p>

## CONDUCT

### Action Step: Create or update Clery Act prevention policy

Role	Subcommittee Participation
<b>Prevention</b>	Participate in training or learning about Clery Act policy requirements for response and disciplinary procedures.. Review policy for Clery Act gaps using tools provided by other subcommittee members.
<b>Conduct</b>	Identify tools (using resources/support from technical assistance providers) for conducting policy review. Cross-train other reviewers on Clery Act requirements and tools for review. Review policy for Clery Act gaps using these tools.
<b>Law Enforcement</b>	Review policy for Clery Act gaps using tools provided by other subcommittee members.
<b>Victim Services</b>	Review policy for Clery Act gaps using tools provided by other subcommittee members.

### Starting Point B: Has no Clery Act coordinator and no cross-departmental team or committee working on Clery Act compliance.

An institution at starting point B may benefit from formally connecting and establishing communication mechanisms between the CCR Team and the existing Clery Act team or committee.

While this connection can be formed in many ways, here are a few examples of how they may work together:

- The existing team or committee should collaborate with members of the CCR Team to set strategic plan goals to avoid any duplication of efforts.
- Key representatives from the committee should provide Clery Act subject matter expertise on related strategic plan goals and implementation, even if they are not a part of the CCR Team.
- There should be scheduled check-ins with the Clery Act team or committee to monitor progress on shared or overlapping goals.
- The team or committee can provide training to the CCR Team to enhance their understanding of the Clery Act so they can help communicate about and champion the institution's Clery Act efforts overall.

## Has no Clery Act coordinator and no cross-departmental team or committee working on Clery Act compliance.

Some campuses may benefit from a formal internal MOU between the CCR Team and the Clery Act Committee. Below is a sample Internal MOU. Be sure to follow your institutional guidelines and templates, if applicable, on how and when to enter into an internal MOU.

This Internal Memorandum of Understanding (MOU) is made and entered into by [Institution's] Clery Act Committee and Coordinated Community Response Team (CCR Team), collectively referred to as "the committees".

- **Purpose and Scope:** The committees recognize the value of a collaborative relationship between [Institution's] Clery Act Committee and Coordinated Community Response Team with the shared goal of compassionate response to victims of dating violence, domestic violence, sexual assault, and stalking. The purpose of this MOU is to clearly identify the responsibilities of each committee in relation to supporting institutional Clery Act implementation.

- **MOU Term:** The term of this agreement is the period within which the responsibilities of this agreement shall be performed. The term commences X date and the terms will be reviewed every three years.
- **Clery Act Committee:** Per its charter, the Clery Act compliance committee is responsible for overseeing the [Institution's] compliance with the Clery Act. Under this MOU, the Clery Act committee agrees to:
  - a. Appoint a liaison to the CCR Team.
    - i. This liaison, in addition to participating in the CCR Team's monthly meetings, will meet quarterly with the CCR Team's steering committee to monitor progress of shared goals.
  - b. Participate in the CCR Team's strategic planning process.
  - c. Provide subject matter expertise to the CCR Team, as requested.
  - d. Conduct annual training for the CCR Team on the Clery Act. Specific topics will be determined by the CCR Team Steering Committee and the Clery Act Committee liaison.
- **CCR Team:** Under this MOU, the CCR Team agrees to:
  - a. Identify goals to support Clery Act compliance within its strategic plan.
  - b. Provide subject matter expertise to the Clery Act committee, as requested.
  - c. Conduct annual training for the Clery Act Committee. Topics include, but are not limited to, the impact of domestic violence, dating violence, sexual assault, and stalking, trauma-informed response, the neurobiology of trauma, consent, and alcohol and drug-facilitated sexual assaults.
- **Amendment:** This agreement may be modified at any time with approval of both parties. Amendments must be in writing and approved in the same manner as the original agreement.
- **Effective Date and Signature:** This MOU shall be effective upon the signature of the authorized officials.

## Starting Point C: Has a designated Clery Act coordinator, but no Clery Act team or committee.

An institution at starting point C may benefit from having the Clery Act Coordinator as an active member of the CCR Team. The campus may also consider developing a Clery Act working group or subcommittee.

The existence of a CCR Team is an opportunity to enhance knowledge of and buy-in for Clery Act requirements across multiple departments. The Clery Act coordinator can play an important role in establishing Clery Act-related strategic plan goals to increase the capacity of the institution to address Clery Act compliance needs.

Even if a Clery Act coordinator exists, consider developing a Clery Act working group or subcommittee specific to meeting Clery-related grant goals. This subcommittee can eventually evolve into a multidisciplinary Clery Act team or committee; however, beginning as a subcommittee allows for the roles to develop their expertise and knowledge while focusing on a few specific, measurable goals.

## Has a designated Clery Act coordinator, but no Clery Act team or committee

**Appoint a subcommittee chair.** This may or may not be the Clery Act coordinator, if one exists. This person should keep all members engaged in the work, and keep the larger CCR Team informed on the subcommittees efforts.

**Set and clearly communicate defined goals for the committee.** Extract the Clery Act goals from the strategic plan and create a centralized document outlining the goals, action steps, and timelines for just the goals specific to Clery Act implementation. (See sample goals below.) Provide training on skills the committee needs to meet these goals. For example, if the committee is charged with identifying campus security authorities (CSAs) under the Clery Act, make sure they understand how CSAs are defined and factors to consider to determine what roles meet these definitions.

**Establish information-sharing strategies.** Have a mechanism for regular updates from the committee. Even if there are regular information-sharing mechanisms like Teams or Slack, make sure there is a reporting schedule that summarizes recent committee activity at least quarterly.

**Stay connected to current news related to the Clery Act.** A recent program review or new guidance may inform how you meet your goals. Set Google alerts for the Clery Act, follow organizations sharing Clery Act updates, and participate in OVW Campus Program events addressing Clery Act topics.

## **SAMPLE CLERY ACT SUBCOMMITTEE GOALS**

### **PREVENTION**

Assess whether existing programs meet Clery Act requirements using existing resources and checklists.  
Revise the institution's dating violence, domestic violence, sexual assault, and stalking prevention policy.  
Develop strategy for documenting prevention efforts across multiple departments and process/timeline for sharing with the Clery Act coordinator for the annual security report.

### **CONDUCT**

Cross-reference policy revisions with Clery Act requirements.  
Evaluate training for individuals responsible for implementing the policy to determine curriculum meets Clery Act requirements regarding annual training.  
Identify campus security authorities under the Clery Act.  
Create an educational plan (in consultation with the CCR Team) for the campus community to raise awareness of the breadth of services available to community members (e.g. population specific trainings, one-sheeters, comprehensive websites). Include written information of on-and-off campus resources as required by Clery.

## LAW ENFORCEMENT

Provide cross-training on the Clery Act to the CCR Team.  
Revise internal protocols for the issuance of Clery Act timely warnings.

## VICTIM SERVICES

- Review current professional guidelines, state law and federal mandates (such as the Clery Act) that influence the reporting requirements of campus and community-based providers. Determine what processes will be necessary to maintain confidentiality and trust while also fulfilling these requirements. Coordinate with members of the CCR Team in developing Clery-required written notification of on-and-off campus resources for all forms of gender-based violence (provided to students and employees) and written explanation of rights and options (provided to all victims of domestic violence, dating violence, sexual assault, and stalking after a report).

### **Starting Point D: Has a designated Clery Act coordinator, and a functional Clery Act team or committee.**

A campus at starting point D has an existing infrastructure for Clery Act implementation and compliance, and is an important resource for the CCR Team. The coordinator and/or other members of the team or committee should consider how they could help educate the CCR Team on the Clery Act, and work with the CCR Team to align goals and priorities.

For example, the CCR Team may have goals that intersect with Clery Act responsibilities. Coordination between the CCR Team and the committee can help avoid duplicating efforts; however, even though a separate committee exists, the CCR Team should not ignore how they might utilize Clery Act requirements to enhance or institutionalize their efforts. There are often benefits to cross-representation across these teams so that learning by the CCR Team can inform the Clery committee and vice versa. For example, the CCR Team spends time thinking about effective strategies for collaboration, collective decision-making, and team engagement. They can share these approaches with the Clery Act committee so they can decide whether to adopt any approaches that benefit team members.

Further, the Clery Act team or committee may be responsible for working to meet strategic plan goals, even if the entire committee does not sit on the CCR Team. If the Clery Act committee is already working on a goal related to developing student conduct training, work with them to ensure these efforts align with grant goals and requirements. This can free up time and capacity for other CCR Team members to work on other deliverables.

## Innovative Practices for the CCR Team



Regardless of your starting point, ensure the CCR Team is aware of Clery Act requirements and how they inform prevention and response to crime on campus. Below are some sample activities that may be helpful at any starting point, but especially helpful for established CCR teams focused on monitoring, assessing, and course correcting Clery Act implementation.

- **Clery Act or campus security authority training for the CCR Team:** Many individuals in the CCR Team are likely required to report crimes under the Clery Act (campus security authorities). Even so, some may be unaware of these responsibilities or have a lack of understanding of the Clery Act in general. Providing Clery Act training for the CCR Team can help set the foundation for future conversations on areas that intersect with the Clery Act, including prevention programs, training for conduct professionals, reporting protocols, and other topics. It can also encourage the CCR Team to consider how they'll utilize the Clery Act to institutionalize CCR Team efforts. For example, as they're working to develop effective prevention programs, an understanding of the Clery Act will allow them to analyze whether these programs are supported by campus policy. This Clery-required policy can be an important requirement to point to when asking for additional campus support for prevention efforts (financial or otherwise). Consider innovative ways to deliver the training that include regular live training, asynchronous options, and skill-based training.
- **Annual Clery Act State of the Union:** The CCR Team can invite individuals responsible for Clery Act implementation and compliance on campus to provide an "annual state of the union" - a presentation that highlights Clery Act crime statistics over the past year, shares any recent policy and procedure changes that might impact reporting on campus or CCR Team activities, and guides a CCR Team conversation around safety trends. If climate survey data exists, it may also compare reporting under the Clery Act to the number of individuals disclosing crime victimization in campus climate surveys. Highlight prevention activities or programs completed over the past year in order to foster intrinsic motivation and hope within the community by demonstrating what the institution is doing to prevent crimes on campus.

- **CCR Team Mock Case Example Exercise:** The CCR Team can walk through the life cycle of a Clery-reportable incident to better understand campus protocols. This could include conversation around campus response in relation to:
  - Reports from campus security authorities;\
  - Clery-reportable offense determinations;
  - Timely warning evaluation;
  - The provision of a written explanation of rights and options to victims; and
  - Rights and processes available to victims (law enforcement, disciplinary/grievance procedures, etc.).
- **Campus Policy Think Tank:** A person or group of people can share common challenges or barriers that stem from Clery Act reporting or disclosures. A think tank can create opportunities for alternate perspectives and contributions from roles that are not traditionally involved in the implementation of Clery Act requirements. Breakout group discussions can set the groundwork for large group processing to develop strategies to address the named challenges or barriers. Clery Centers' document [Viewing the Clery Act Through An Intersectional Lens](#) can be used to identify potential barriers the group may want to discuss.

## Sustainability

Establishing strong, multidisciplinary structures, processes, and activities within your CCR Team efforts is the path towards sustainability.

Build leadership within your team so the work can continue if there is turnover of key personnel. If your Clery Coordinator leaves tomorrow, will your institution know what steps to take next and how to continue the work? How does this connect with the succession plan for the Clery Coordinator? (Does one exist? Who has access to it?)

We can ensure our work is sustained through succession planning; building collective leadership and expertise around Clery Act compliance, transparency, shared decision-making, and creating feedback mechanisms.

There also needs to be opportunities to gather feedback from stakeholders on how implementation is going and campus context influencing your implementation. This means having an option for CCR Team members to raise questions and concerns about practices on campus that may be outside of their individual roles but relevant to Clery Act implementation.

## For More Information and Support

National Organization for Victim Advocacy  
(NOVA), Coordinated Community Response  
<http://www.trynova.org> | [CampusTA@trynova.org](mailto:CampusTA@trynova.org)

Clery Center, Clery Act Technical Assistance  
[www.clerycenter.org](http://www.clerycenter.org) |  
[OVWCleryTA@clerycenter.org](mailto:OVWCleryTA@clerycenter.org)





CAMPUS  
Technical Assistance  
and Resource Project



NOVA

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