

September 12, 2017

Re: Clarification/Changes to current Clery guidelines

With the publication of the 2016 Handbook for Campus Safety and Security Reporting came updated guidance with respect to the need to report crimes when students are traveling for study-abroad or short-stay away trips. There are many problems with this requirement, not the least of which is the tracking of all students, especially at larger institutions, who travel and meet this guideline.

Since we, as an institution, must request Clery crime statistics for the locations included in the travel, the request goes to law enforcement agencies around the country and around the world. While only sections of hotels are included in the request for statistics (for example, room, hallway, lobby, etc.), we know for all practical purposes, no law enforcement agency is going to be able to break down the location in that kind of detail. What we end up with is a request for crime statistics based on the address, which again, is not a true reflection of the Clery geography, as indicated by the Department of Education. Additionally, many jurisdictions, especially overseas, do not break down crime statistics for specific locations. For example, Germany only provides crime statistics for the entire city, not for specific addresses.

As for the purpose of requesting and including this data in an annual security report (ASR), it does not seem to give the reader or reviewer of the ASR any information which would give the reader a better picture of crime associated with attending our institution or any other, for that matter. The data, as currently displayed, is included in table which merely shows Clery act crimes which have occurred on non-campus property. Any parent or other reviewer of the ASR, would not have any idea where these crimes occurred, in which city, state or country (unless every location, which reported an incident, was included in a narrative format or very detailed table).

I believe the best way to handle the issue of travel is for all faculty or facilitators, traveling with students, should be designated as CSAs and would be responsible for reporting any Clery act crimes which they are made aware of during the trip (as is currently required to report all Title IX incidents which occur, off-campus). The CSA would then ensure any Clery act crime is reported to the appropriate local jurisdiction and services are available to victims (if there are any locally) or for follow-up with resources available to the students upon returning from the trips. With this proposed procedure, the incident would be handled like an off-campus Title IX incident, with the emphasis being that of support for the victim (and possible university discipline, if warranted) rather than just data collection on a report which again, does not reflect the crime on or near the university campus.

Under the topic of categories for review, I am recommending a revision to the crimes collected and reported to delete the category of "Incest". I am not aware of any "Incest" incident ever occurring at a college campus.

Respectfully submitted,

Kirk M. Fitch, M.Ed, CPM  
Director of Clery Compliance  
NAU Police Department  
525 E. Pine Knoll Drive, Flagstaff AZ. 86011  
Office: 928-523-9491  
[Kirk.fitch@nau.edu](mailto:Kirk.fitch@nau.edu)

